Submission Type

I am making a personal submission

Title

Mr

First Name

Hugh

Family name

Bartsch

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

1.1 I write to lodge a formal objection to Planning Proposal PP-2023-1109, which seeks to amend the Hunters Hill Local Environmental Plan 2012 to facilitate a seniors living development at 116–120 High Street, 2–20 Gaza Avenue and 4 Barons Crescent, Hunters Hill.

1.2 My objection is based on established planning grounds, including inconsistencies with the surrounding character, adverse traffic and road safety impacts, excessive height and density, inadequate infrastructure capacity, and broader strategic planning concerns.

_____

2. Traffic, Road Network Capacity and Safety

2.1 High Street, Gaza Avenue and Barons Crescent comprise narrow local roads designed for low-volume, low-speed residential traffic. These roads do not provide the geometry, width or carrying capacity required to safely accommodate the significant increase in construction and operational traffic associated with a high-intensity seniors living facility.

2.2 The proposal fails to demonstrate how construction-related heavy vehicles, delivery trucks, service fleets and potential crane operations will be managed without causing road blockages, safety hazards, and unacceptable disruption to residents. There is no clear traffic staging plan addressing lay-down areas, vehicle marshalling or peak-hour constraints.

2.3 Operationally, seniors living developments generate ongoing service traffic, including medical transport, staff movements, waste collection, deliveries, and resident and visitor parking demands. The existing road network cannot safely support this level of intensification without compromising road safety, reducing on-street parking and creating congestion inconsistent with the intended function of these residential streets.

2.4 The absence of a detailed traffic impact assessment that accounts for both construction and occupation reinforces that the road network is fundamentally unsuitable for a development of this scale.

_____

3. Height, Bulk, Scale and Built-Form Impacts

3.1 The planning proposal seeks to increase the maximum height of buildings to 16m, 18m and 24m—substantial departures from the prevailing 1–2 storey residential pattern of development in this part of Hunters Hill.

3.2 The proposed building heights, massing and bulk are inconsistent with the desired future character of the locality and will visually dominate neighbouring properties. The scale is incompatible with the low-density residential setting and will result in adverse visual and amenity impacts, including overlooking, overshadowing and loss of privacy.

3.3 Increasing the floor space ratio (FSR) from 0.5:1 to 1:1 represents a doubling of development intensity. This FSR is characteristic of higher-density mixed-use or urban environments, not suburban residential areas served by constrained local roads.

3.4 The proposed built form does not transition sensitively to adjoining properties and represents an institutional scale inappropriate for this site and its context.

_____

4. Land-Use Compatibility and Local Character

4.1 The site is currently zoned R2 Low Density Residential. The planning proposal seeks to rezone the land to SP2 Infrastructure (Seniors Housing). This represents a fundamental shift in land-use character and is inconsistent with the long-established residential nature of High Street and its surrounds.

4.2 The introduction of an institutional seniors living facility in this location will erode the low-density suburban character and set an undesirable precedent for future departures from the Hunters Hill LEP 2012 and associated strategic planning frameworks.

Submission Type

I am making a personal submission

Title

Mr

First Name

Joe

Family name

P

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

Can you please email me the architectural plans, sections and elevations including a site plan. I could not find this on the exhibition docs. thanks.

Submission Type

I am making a personal submission

Title

Ms

First Name

Patricia

Family name

Clifford

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

This submission relates to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal.

I object to the proposal for the following reasons:

1. The Planning Proposal will result in a range of significant impacts for the local area. These impacts have been inadequately identified, specified and explained in the Planning Proposal.

2. The Planning Proposal does not include a Master Plan that clearly and accurately shows where the buildings would be, how high and for what function.

3. Proposed building heights are too high and of excessive scale and bulk. The proposal needs to be much more moderate in scale.

4. This Medium to High Rise development will look and feel very different to the surrounding R2 Low Rise Two Storey Residential suburb.

5. Community consultation has been inadequate (contrary to Local Planning Panel advice). No Council or State Government Community Consultation meetings have been held.

6. The Planning Proposal fails to meet a core requirement of the current Hunters Hill LEP, namely, achieving a strategic outcome that “Neighbourhoods Reflect Local Character”. DPHI’s own Seniors Housing Design Guide 2023 characterises 2-3 storeys as “Medium Density” and anything above that as “High Density”.

7. It fails to meet the principle of consistency with neighbourhood amenity and streetscapes.

8. It fails to meet the principle of protecting visual and acoustic privacy. These buildings will overlook their neighbours.

9. It is likely to significantly increase traffic in an area with small, congested streets, already suffering multiple traffic issues and rapidly increasing housing and population density. It is believed that there will be a total of around 300 workers at Montefiore. Staff traffic, along with resident movements and service vehicles, will not only impact High Street, Barons Crescent, Park Road and Gaza Ave but also impact minor streets and approach roads towards Ryde Road and Pittwater Road.

10. It may increase pedestrian safety risks. Busier streets mean more risk over a larger area.

11. It may increase local street parking issues. Not everyone occupying, working in or visiting the site will choose the underground carpark if street parking is closer to pedestrian entries.

12. It may increase local noise issues. Car noise and general activity associated with an increased population of residents and workers. Especially concerning is car noise and traffic with late-night shift changeovers.

13. Issues such as light spill, noise and general activity may disturb nearby residents and impact on local wildlife.

14. The proposed entry to the underground carpark and Loading Dock in Barons Crescent (to be relocated further south than the current location) will likely cause traffic disruption, congestion and accident risk in Barons Crescent and surrounding area for cars, buses and people.

Instead of the current short and direct route along High Street to the Montefiore Home Vehicle Entrance, roughly half the future vehicles are expected to use the Barons Crescent carpark entry/exit by driving through Park Rd, Blaxland Rd, Barons Crescent south / north or Gaza Ave.

15. The site is isolated from major roads, transport and facilities, contrary to recent State Government housing policy. The Site is around 1.2km from the nearest shops at Boronia Park.

16. The construction period could be at least two years of major disruption, parking problems with trades, heavy vehicles, work and traffic control zones, significantly increased vehicle movements, noise and dust. The removal of a huge amount of soil and rock to excavate and build the underground basement and carpark is expected to result in a massive number of heavy truck movements through our narrow suburban streets.

17. The current and proposed future use of Montefiore has been confirmed as residential. A Residential zoning should apply to the site. It does not have relevant infrastructure to justify rezoning as SP2 Infrastructure (Seniors Housing).

18. The rezoning of this residential land to SP2 Infrastructure (Seniors Housing) will set a major precedent within the Municipality of Hunter’s Hill (and elsewhere in Sydney) allowing building heights which are inconsistent with existing LEPs and local character.

Submission Type

I am making a personal submission

Title

Ms

First Name

Clare

Family name

Doube

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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☑ I agree to the Privacy statement

submission

2A Barons Cres
Hunters Hill
2/12/2025

To Whom It May Concern,

We are writing to you to express our objection to the Montefiore Development Proposal at 45-47 Barons Cres Hunters Hill and to

register our opposition to said proposal. (Outlined in the planning panel letter of 24/11/25.)

During the 27 years we have lived in this area we have noticed the increasing degradation of the bushland nature of this area at the hands of developers. (For example, Barons Cres and Paines Rd developments over the past 5 years and the consequent illegal removal of many significant trees.)

Over the last five years we seem to be constantly surrounded by construction noise pollution, the increase of hard surfaces, the removal of native trees and the degradation of local roads by huge trucks.
We are worried about the changing character of Boronia Park from Bushland to Urban setting and allowing the Montefiore Development to go ahead will spoil the peaceful ambience of the area.

The proposed two x 4 storey buildings facing Barons Cres are twice the current max building height and the 2 x 6 storey buildings in the centre of the proposed development are almost 3 times the current max building height are a worry…does that mean that the changes proposed to the building code are going to set a precedent for further developments in Hunters Hill and even in greater Sydney residential areas? The proposed development is just too big for this locale. This is a high density proposal in a low density area.

We are also worried about the vague nature of the proposed development. The attention to detail was so underwhelming that the planning panel had the wrong address on the development proposal and stated last week that the development address was #4 Barons Cres which sent our neighbours into a spin!

Also, the proposed underground work for the development of the car park at the end of our street is very worrying. Having huge trucks removing soil and using the narrow roads in the area are non-optimum. Especially given the extreme bend at the end of Barons Cres where it joins Blaxland St. We regularly see motorists and buses veering over to the wrong side of the road whilst speeding around this blind bend. There are regular accidents on the bend as evidenced by the damage to the guard rail. And even after the proposed development is completed there will be a huge increase in the amount of local traffic given the increased amount of people both staff and residents coming and going from the facility.

When we first heard about the development in 2023 there was no mention of an underground carpark accessed through Barons Crescent. We are concerned about the excessive noise the increased traffic is going to create. And not only that but the extra wear and tear on the road surfaces which council already has a tough time keeping up with.

We regularly walk around the area and there are no pedestrian crossings and a lot of the footpaths in Barons Cres are non-existent and/or in very poor shape. Again, the extra traffic created by this development is concerning for our safety as pedestrians.
The local infrastructure does not support an increase of this magnitude coming into the area.

The quality of life of existing residents of this area and its surrounds must be retained and even to consider a long and stressful nearby development is worrying for mental health. We can’t imagine what the residents of Gaza Avenue must be feeling. Having to be in the middle of such an enormous noisy development must be very daunting indeed.

Our peaceful bushland setting has been gradually degraded over the last five years and we are worried at the current trend of development proposals at Montefiore Barons Cres and High St. Please let us live in this area in peace as we have in the past. No amount of “progress” is worth the loss of local lifestyle.

Yours Faithfully,
Clare Doube and Robert Gates
Lot 2 DP 874459

Submission Type

I am making a personal submission

Title

Mr

First Name

Ross

Family name

Williams

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

I hereby lodge an objection to the proposed development at Montefiore Seniors Living Proposal for the following reasons:

A. The site is not consistent with the state governments housing policy and isolated from major roads, transport and facilities, The Site is greater than 800m from the nearest facilities. By definition it does not meet the basic intent of the governments policy and must be rejected.

B. The Planning Proposal will significantly impact on the local area and its residents. The Planning Proposal fails to meet a core

requirement of the current Hunters Hill LEP, namely, achieving a strategic outcome that “Neighbourhoods Reflect Local Character”. DPHI’s own Seniors Housing Design Guide 2023 characterises 2-3 storeys as “Medium Density” and anything above that as “High Density”. This will set a precedent within the Municipality of Hunter’s Hill (and elsewhere in Sydney) allowing building heights which are inconsistent with existing LEPs and local character.

C. The Planning Proposal does not sufficiently show where the buildings would be, how high and for what function. The DA process could facilitate an outcome alien to the current concept plans and diagrams.

D. This Medium to High Rise development will be inconsistant with Two Storey Residential suburb. Proposed buildings are too high and of excessive scale and bulk.

E. Community consultation has been inadequate (contrary to Local Planning Panel advice).

F. The Planning Proposal will result in traffic congested streets, already identified in Councils LATMP.

G. The development does not provide for sustainable affordable housing. Housing for staff is not likely to be taken up and ultimately converted to full cost housing. This proposal does not provide an inclusive housing type but expensive high end appartments.

H. The proposal does not adequately identify or address the real risk of bushfire impact.

Submission Type

I am making a personal submission

Title

First Name

LEN

Family name

CONDON

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

Objection to PP 2023-1109
1
The number of proposed Storeys is at odds with the heights proposed. For example Building A on the corner of Barons Crescent and Gaza Avenue is proposed to be 4 storeys high which is twice the height of the highest house in the street, and proposes a height limit of possibly 16 metres (not confirmed as no reply to phone calls)
It appears that generally that extra storeys could be allowed if these heights are approved
2

Rezoning to SP2 is ridiculous in an R2 residential area over 1 kilometre from the shopping centre at Boronia Park.

3

Both Barons Crescent and Gaza Avenue are narrow streets which don’t allow 2 vehicles to pass in opposite directions now so the increased traffic will make the streets more dangerous.

4

Montefiore should agree to pay council rates to help with ongoing road damage.

5

This development is really for expensive housing to be sold off under strange arrangements. We need more low cost housing not this

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

The Planned Montefiore redevelopment is very significant for Hunters Hill residents who live in its close vicinity. There will many trucks, vans, and cars that will come through our narrow streets. Parking that is already difficult will become a much larger problem. The planned development of 2,4, and 6 story building is nearly 3 times the current limits. There is more traffic threatened for already busy Boronia park.

I hereby express my strong objection to this redevelopment.

Submission Type

I am making a personal submission

Title

Dr

First Name

Shahab

Family name

Zowghi

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

I am a resident of Hunters Hill. In the last sixteen years that I have been living in this area the traffic volumes have steadily grown, and the state of the local roads have deteriorated in proportion. Ryde Road and Pittwater Road that would be used to approach the site already suffer from traffic congestion, especially during the daily rush hour when traffic is often at a crawl or stand still. This development would adversely affect this dire situation not only during the construction period when many trucks will come into the area causing additional safety issues for the road users, but permanatly if this development goes ahead. There is no public transport available in the area other than buses that run fairly infrequently. Most of the residence therefore rely on driving their private cars. A

development of this king would add to the existing transport hardships of the residence. I therefore strongly object to this proposed development proceeding.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

I am in support of the proposal and live quite close to the site. I think it will provide much needed seniors housing supply to an area that is in great need of this type of housing.

There are negligible traffic areas in our area and this is a low impact use.

The height and density is reasonable and can be readily accommodated on a large site such as this.

Fantastic for staff accommodation to be provided, especially given the affordable housing issues facing Sydney - particularly in an area such as Hunters Hill.

Opposition to the project is negligible in the local community, except from a minority of residents in close proximity to the site - who should really be in favour as the current property is aging, does not face well to the neighbouring streets. The proposal activates the frontages and improves the offering of the project in the long term.

In terms of the proposal, it is hard to find any fault with it.

I have nothing to do with the site's owners - am simply sick of people objecting to quality projects (and trying to drum up community opposition) on the basis of ill-informed arguments such as 'traffic' and 'bulk and scale' which have so clearly been addressed in the objective assessment of this proposal.

Bring it on!

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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No

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submission

Hi I do not believe that this development is good for the community. The new development would cause a lot of disruption to personal lives and people already staying in the development area with young families would be made homeless. The extra traffic would be cause a lot of stress. This planned development is not a good idea

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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No

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submission

I strongly oppose the proposed expansion of Montefiore.

The size and scale of this development are completely inappropriate for this residential area. If approved, it would dominate the streetscape and be directly opposite my home, resulting in a significant and ongoing loss of residential amenity. The proposal is clearly out of character with surrounding dwellings and represents overdevelopment of the site.

The expansion would also lead to increased traffic, parking congestion, service vehicles, and noise, placing unreasonable pressure on

a quiet residential street and creating safety concerns for local residents.

This proposal fails to adequately consider the impact on nearby homes and the existing character of the neighbourhood and should not be approved.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

hunters hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

To Whom it may concern:
I refer to PP-2023-1109: in Hunters Hill.
My Submission is to say that I object to parts of this Proposal. Reasons being:
Briefly: 1/ As I live in High St. & am very aware of the traffic noise & parking issues already associated with Montefiore Home, which is already heavy, particularly in the shift changes of current employees. With more (possibly around 300) workers, plus resident movements & service vehicles, High St. will be even more highly impacted.
2/ Parking Issues: High St. is already suffering parking issues, as most of the workers already park their cars in High St. & surrounds.

This could get worse as not every worker will drive to the proposed underground parking.
3/ Construction period could be 2 years, causing more problems with heavy vehicles, trades, etc. The removal of huge amount of soil & rock to excavate will result in massive heavy truck movements in High St. & surrounds.
This is just a few of the problems which I envisage happening if this huge Proposal goes ahead.

[redacted]

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

I am writing this submission in opposition to a number of impacts that the Montefiore planning proposal doesn't seem to deal with appropriately.

I am a local resident living on Barons Crescent and have a real stake in this proposal at it will undoubtedly change the character of this area permanently.

My major concerns are as follows,

1/ The proposal doesn't attempt to keep the residential character of the area in a meaningful way, applying 4 levels on the corner of Gaza Ave and Barons cr doesn't seem to keep in any way with terracing the scale into the site.
2/ Will there be sufficient setbacks? The existing older buildings aren't tall, so if Montefiori wants more height they should seek for this within the centre of the property not on residential streets. 4 story on Barons cr isn't ideal for the streetscape unless Montefiori adds a vegetation buffer.
3/ Traffic should be focused on the main entrance on High St.
4/ Total accommodation should be consistent with reasonable total traffic accessible through High St. Can the site accommodate that many new residences? High st looks like a car park on most days, why should the locals give up their amenity for Montefiori staff? Can the proposal provide parking for staff as well or will this now creek into other streets?

All in all I am very supportive of the Montefiori mission but not at the cost of the character of our locality. The proposal may just be a little too ambitious, and the planners are not familiar with the quiet nature of Barons cr and Gaza Ave which will be heavily impacted.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

I have been a resident of Hunters Hill for over 30 years and, of these, the last 25 years living on Barons Crescent opposite the Montefiore Retirement Village.

The proposal to allow 4 and 6 storey buildings up to 24m in height in a predominately residential area is out of character with the surrounding neighborhood.

The proposed FSR gross overdevelopment of the site to allow an FSR of 1:1, increases the allowable FSR of 0.5:1 by 100%. Together

with a massive underground carpark, will place enormous pressure on the local area infrastructure and safely around surrounding narrow streets, footpaths and park lands. Already there is significant commercial traffic around the area to service the existing Retirement Village - the increase in staff numbers and proposed new self-care seniors accommodation and visitors will definitely increase motor vehicle traffic in-and-out of the site.

I cannot support the proposed changes to the existing LEP 2012 which would allow gross overdevelopment of the Montefiore site (particularly the 3-4 storey height along Barons Crescent) and create safety issues for all other residents and neighbors, further congest the existing road infrastructure with additional vehicles parking on neighboring streets.

In addition, the indicative Site Concept Plan (Nov-2025) shows new pedestrian access to the Village via Gaza Avenue and Barons Crescent which, in my opinion, will encourage motor vehicle parking on these streets to avoid the on-site parking.

Kind regards.

Submission Type

I am making a personal submission

Title

Ms

First Name

Rachel

Family name

Quinn

☐ Name withheld

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Email

[redacted]

Suburb/ Town

HUNTERS HILL

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submission

Dear Planning Authority,

I am writing to express my strong opposition to the proposed Montefiore Seniors Living Redevelopment (PP-2023-1109), which is currently on public exhibition.

One of my primary concerns is the proposed building heights of 4, 5, and 6 storeys reaching up to 24 metres, which are nearly three times the current planning limits for Hunters Hill. This dramatic increase is not only inconsistent with the established character of the

area, but it also sets a dangerous precedent for future overdevelopment.

Key impacts of excessive building height:
Loss of neighbourhood character: Boronia Park is defined by its low-rise, leafy streetscape. Buildings of this scale will dominate the skyline and erode the visual harmony of the area.

Overshadowing and loss of natural light: Taller structures will cast significant shade over nearby homes, gardens, and public spaces, reducing sunlight and affecting livability.

Reduced privacy: The height and density of the proposed buildings will overlook surrounding properties, compromising the privacy of existing residents.

Visual bulk and street appeal: The sheer mass of the development will overwhelm the streetscape, making the area feel congested and urbanised rather than residential and community-focused.

The current planning controls exist to preserve the unique character and scale of Hunters Hill. Approving a development that blatantly exceeds these limits undermines the integrity of the planning system and disregards the values of the local community.

I urge you to reject this proposal and uphold the existing planning standards that protect our neighbourhood.

Sincerely,
Rachel Quinn

Submission Type

I am making a personal submission

Title

Mr

First Name

Peter

Family name

Quinn

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

HUNTERS HILL

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☑ I agree to the Privacy statement

submission

To whom it may concern,

As a long-term resident of Boronia Park, I am extremely worried about the impact the proposed Montefiore redevelopment will have on our neighbourhood. The plan includes buildings up to 24 metres high — far above the current planning controls. This will dramatically alter the look and feel of our streets, block sunlight, and overshadow surrounding homes.

Equally concerning is the decision to place the main entrance on our quiet street. This will bring a constant flow of trucks, staff

vehicles, and visitors into an area that is already narrow and difficult to navigate. The huge underground carpark will only add to the traffic burden.

This development is simply too large for our community, and I ask that it not be approved.

Kind regards
Peter Quinn

Submission Type

I am making a personal submission

Title

Miss

First Name

Riley

Family name

Quinn

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

HUNTERS HILL

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submission

Dear Planning Authority,

I wish to lodge my objection to the Montefiore Seniors Living Redevelopment currently on exhibition. The proposal significantly exceeds the existing building height limits for Hunters Hill, with structures up to 24 metres high. This is entirely inconsistent with the established low-rise character of Boronia Park and will create overshadowing, loss of privacy, and a visually intrusive built form.

I am also concerned about the proposed entry point being located on my quiet residential street. This will funnel large volumes of

traffic, including construction trucks and service vehicles, into an area not designed to handle such loads. The addition of a large underground carpark will only intensify congestion and parking pressure.

For these reasons, I strongly oppose the proposal and urge that it be rejected.

Sincerely,
Riley Quinn

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

HUNTERS HILL

I have made a reportable political donation

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☑ I agree to the Privacy statement

submission

Dear Assessment Panel,

I am submitting a formal objection to the Montefiore redevelopment proposal. The scale of this project is incompatible with the planning framework for Hunters Hill. The proposed 4–6 storey buildings, reaching up to 24 metres, exceed current height limits by a wide margin and would create unacceptable visual bulk, overshadowing and loss of amenity for nearby residents.

The traffic impacts are equally unacceptable. Positioning the site entrance on my quiet residential street will introduce heavy vehicles,

delivery trucks and increased daily traffic into an area not designed for such intensity. The large underground carpark will further encourage high vehicle volumes, undermining safety and residential amenity.

This proposal disregards the character, constraints, and planning objectives of the area. I strongly urge the panel to reject it.

Regards

[redacted]

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

This submission relates to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal

To Whom It May Concern,

I write to formally object to the Exhibition of Planning Proposal PP-2023-1109 – Montefiore Seniors Living, which seeks to amend the applicable Local Environmental Plan (LEP) by:

• Rezoning part of the land from R2 Low Density Residential to SP2 Infrastructure (Seniors Housing); and
• Increasing the maximum height of building controls from 8.5 metres to 16 metres, 18 metres and up to 24 metres on parts of the site.
These proposed amendments are wholly inappropriate for the Hunters Hill local government area and are fundamentally inconsistent with the established and strategic planning framework governing R2 Low Density Residential zones.

1. Inconsistency with R2 Low Density Residential Character

Hunters Hill is characterised by low-density, low-rise residential development with strong environmental and heritage values. The proposed rezoning and substantial height increase represent an extreme departure from the existing planning controls and would permanently undermine the low-scale, low-impact character of the area.
Permitting buildings up to 24 metres in height within or adjacent to an R2 Low Density zone sets a dangerous planning precedent and directly conflicts with the objectives of the LEP, which are intended to protect residential amenity, streetscape character, and environmental qualities.

2. Unacceptable Traffic, Access and Noise Impacts – Barons Crescent

A critical and unacceptable aspect of this proposal is the relocation of the existing vehicle access from Barons Crescent to a location directly opposite our property at 94 Barons Crescent, providing ingress and egress to a new basement-level car park accommodating an additional 151 vehicles.
This change will result in:
• A substantial increase in daily vehicle movements in Barons Crescent, a quiet, no-through residential street;
• Increased noise, vibration, headlights, and safety risks immediately adjacent to existing homes;
• Increased heavy vehicle traffic, including service and delivery vehicles, using the relocated access point;
• A severe degradation of residential amenity for nearby dwellings.
It is particularly concerning that the proposal fails to adequately acknowledge that Barons Crescent is not designed to function as a high-capacity access route for large-scale development.

3. Change in Resident Profile and Traffic Generation

The existing Montefiore facility predominantly accommodates elderly residents who generally do not drive. However, the proposal explicitly seeks to increase Independent Living Units from 18 to 144, which will inevitably result in:
• A significant increase in private vehicle ownership;
• Increased visitor, staff, contractor, and service vehicle traffic;
• Ongoing operational impacts that are incompatible with the surrounding residential environment.
The traffic and parking impacts associated with this scale of independent living development have not been adequately mitigated and will disproportionately burden Barons Crescent residents.

4. Existing and Established Alternative Access

We strongly object to the relocation of the vehicle access further down to Barons Crescent and submit that:
• The existing vehicle access further along Barons Crescent toward Gaza Street should be retained, upgraded, and utilised;
• This access arrangement has operated for many years;
• Residents located opposite that access point were aware of its presence when purchasing their properties;
• Maintaining this access would significantly reduce the adverse and inequitable impacts on other residents, including those at 94 Barons Crescent.
The proposed relocation represents an unnecessary redistribution of impacts rather than a genuine planning solution.

5. Adverse Impact on Property Values and Reasonable Expectations

The proposal will significantly reduce surrounding property values and fundamentally alter the amenity and character of Barons Crescent. We purchased our home in reliance on:
• The R2 Low Density Residential zoning;
• Height limits of 8.5 metres;
• The quiet, leafy, no-through nature of Barons Crescent;
• The immediate proximity to Lane Cove National Park.
The proposed amendments would completely destroy the very attributes that justified our investment and are wholly inconsistent with the reasonable expectations of local residents.

6. Support for Appropriate Upgrade Within Existing Controls

We wish to make it clear that we are not opposed to the upgrade or renewal of the existing Montefiore facility in principle. We would be supportive of an upgrade of this ageing facility where such works are consistent with the existing LEP controls, respect the established R2 Low Density Residential zoning, and are designed to minimise adverse impacts on surrounding residents, as outlined above.

7. Conclusion

For the reasons outlined above, we strongly object to Planning Proposal PP-2023-1109 in its entirety. The proposal represents an unjustified and excessive departure from established planning controls, causes unacceptable amenity, traffic, and noise impacts, and undermines the strategic planning integrity of Hunters Hill.

We respectfully request that the Planning Proposal not be supported or progressed in its current or any similar form.

Hunters Hill, 02/01/2026

[redacted]
[redacted]Barons Crescent
Hunters Hill NSW 2110

Subject: Objection to Planning Proposal PP-2023-1109 – Montefiore Seniors Living

This submission relates to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal

To Whom It May Concern,

I write to **formally object** to the Exhibition of Planning Proposal PP-2023-1109 – Montefiore Seniors Living, which seeks to amend the applicable Local Environmental Plan (LEP) by:

- Rezoning part of the land from **R2 Low Density Residential** to **SP2 Infrastructure (Seniors Housing)**; and
- Increasing the maximum height of building controls from **8.5 metres** to **16 metres, 18 metres and up to 24 metres** on parts of the site.

These proposed amendments are wholly inappropriate for the Hunters Hill local government area and are fundamentally inconsistent with the established and strategic planning framework governing R2 Low Density Residential zones.

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1. Inconsistency with R2 Low Density Residential Character

Hunters Hill is characterised by low-density, low-rise residential development with strong environmental and heritage values. The proposed rezoning and substantial height increase represent an extreme departure from the existing planning controls and would permanently undermine the low-scale, low-impact character of the area.

Permitting buildings up to 24 metres in height within or adjacent to an R2 Low Density zone sets a dangerous planning precedent and directly conflicts with the objectives of the LEP, which are intended to protect residential amenity, streetscape character, and environmental qualities.

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2. Unacceptable Traffic, Access and Noise Impacts – Barons Crescent

A critical and unacceptable aspect of this proposal is the relocation of the existing vehicle access from Barons Crescent to a location **directly opposite our property at [redacted]Barons Crescent**, providing ingress and egress to a new basement-level car park accommodating **an additional 151 vehicles**.

This change will result in:

- A substantial increase in daily vehicle movements in Barons Crescent, a quiet, no-through residential street;
- Increased noise, vibration, headlights, and safety risks immediately adjacent to existing homes;
- Increased heavy vehicle traffic, including service and delivery vehicles, using the relocated access point;
- A severe degradation of residential amenity for nearby dwellings.

It is particularly concerning that the proposal fails to adequately acknowledge that Barons Crescent is not designed to function as a high-capacity access route for large-scale development.

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3. Change in Resident Profile and Traffic Generation

The existing Montefiore facility predominantly accommodates elderly residents who generally do not drive. However, the proposal explicitly seeks to increase **Independent Living Units from 18 to 144**, which will inevitably result in:

- A significant increase in private vehicle ownership;
- Increased visitor, staff, contractor, and service vehicle traffic;
- Ongoing operational impacts that are incompatible with the surrounding residential environment.

The traffic and parking impacts associated with this scale of independent living development have not been adequately mitigated and will disproportionately burden Barons Crescent residents.

---

4. Existing and Established Alternative Access

We strongly object to the relocation of the vehicle access further down to Barons Crescent and submit that:

- The **existing vehicle access further along Barons Crescent toward Gaza Street should be retained, upgraded, and utilised**;
- This access arrangement has operated for many years;
- Residents located opposite that access point were aware of its presence when purchasing their properties;
- Maintaining this access would significantly reduce the adverse and inequitable impacts on other residents, including those at 94 Barons Crescent.

The proposed relocation represents an unnecessary redistribution of impacts rather than a genuine planning solution.

---

5. Adverse Impact on Property Values and Reasonable Expectations

The proposal will significantly reduce surrounding property values and fundamentally alter the amenity and character of Barons Crescent. We purchased our home in reliance on:

- The R2 Low Density Residential zoning;
- Height limits of 8.5 metres;
- The quiet, leafy, no-through nature of Barons Crescent;
- The immediate proximity to Lane Cove National Park.

The proposed amendments would completely destroy the very attributes that justified our investment and are wholly inconsistent with the reasonable expectations of local residents.

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We wish to make it clear that we are not opposed to the upgrade or renewal of the existing Montefiore facility in principle. We would be supportive of an upgrade of this ageing facility where such works are consistent with the existing LEP controls, respect the established R2 Low Density Residential zoning, and are designed to minimise adverse impacts on surrounding residents, as outlined above.

7. Conclusion

For the reasons outlined above, **we strongly object** to Planning Proposal PP-2023-1109 in its entirety. The proposal represents an unjustified and excessive departure from established planning controls, causes unacceptable amenity, traffic, and noise impacts, and undermines the strategic planning integrity of Hunters Hill.

We respectfully request that the Planning Proposal **not be supported or progressed** in its current or any similar form.

Yours faithfully,

[redacted]

[Property Owners – [redacted]Barons Crescent, Hunters Hill]

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters HILL

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

I object to the proposed development on the following grounds:
1. Increase on traffic on already busy residential roads.
2. Increased building heights- fare higher than surrounding areas.
3. Increase size of new residents population- already sufficient residential care facilities in area..
4. Proposal includes reduction on aged care beds.
5. Blatent profit making enterprise.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hi;;

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

The LEP was put in for a reason. The area is such a nice family area that suffers enough from all the staff clogging up the residential streets. Building such a large developments is not consistent with the area and will cause visual pollution and even more traffic issues.

Submission Type

I am making a personal submission

Title

Mr

First Name

Allan

Family name

Parapuram

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

We need more seniors housing and Montefiore look after their residents well. Parking for staff and when many visitors come - it is poorly located given the small residential streets around it and that a national park shuts off other access to parking. I have pictures as an example of a normal day where workers fill up all the spaces and park illegally making it difficult to go in and out of homes. Garbage collection is disrupted sometimes as trucks cannot enter the street. This will become unliveable making the area more and more unattractive. I have a question about the size - how large does it need to be given this is a very quiet residential area? Surely there are other sites where increases can also be accommodated.

I support some increase, the ageing demographic means that we need this facilities - it is the proportionality I query. I feel we already need more parking rangers and 2P parking on our street, given the large numbers of visitors and workings insisting on driving, can we have a feeder carpark and shuttle buses? Please look at innovative ways that Montefiore and its residents and their relatives share with the residents the additional inconvenience and hassle.

Finally, I am concerned at the current situation where there is additional security and indeed some increased risk currently experienced by our Jewish friends. I do not really welcome this added security risk to my residential area. That needs to be also considered.

Submission Type

I am making a personal submission

Title

First Name

Kate

Family name

Russell

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

HUNTERS HILL

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

I would like to object to PP2023-1109 for a number of reasons. Please see the attached submission

Re Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal

I object to this proposal for the following reasons:

1. This is an unsuitable location for a major housing development. The site is isolated from major roads, transport and facilities, contrary to recent State Government housing policy. It is 1.2km from the nearest shops at Boronia Park.
2. The proposed building heights are of excessive height, scale and bulk and is out of keeping with the surrounding R2 Low Rise Two Storey Residential suburb.
3. The impact on the neighbouring area has not been adequately assessed.
4. There is insufficient information as there is no Master Plan to accurately explain the purpose of each of the proposed buildings.
5. The current and proposed future use of Montefiore is residential hence a Residential Zoning should apply to the site. It does not have relevant infrastructure to justify rezoning as SP2 (Seniors Housing).
6. Building B will not be for seniors' residential accommodation, so it should not be four storeys high.
7. There is limited public transport in this neighbourhood, so most staff and residents and visitors will need to drive into these small, already congested streets. There will be significant changes to traffic loads.
8. The rezoning of this residential land to SP2 will set a precedent within the Municipality of Hunter's Hill (and elsewhere in Sydney) allowing building heights which are inconsistent with existing Local Environment Plans and local character.

Yours faithfully

Kate Russell

58 Barons Crescent
Hunters Hill 2110
Phone [redacted]
[redacted]

Submission Type

I am making a personal submission

Title

First Name

Richard

Family name

Willcock

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

Please see attached Submission.

The Submission has 2 attachments. These will be uploaded separately due to the portal not allowing separate attachments.

Montefiore Seniors Living Proposal (PP-2023-1109)

Submission – Traffic Impact in the Boronia Park Precinct

Summary

1. The Boronia Park precinct is bounded by two State roads - Road and Pittwater Road. All traffic which enters or exits the precinct either turns from or crosses one of these two roads.

2. All traffic which will be generated by the planned development of Independent Living Units (**ILUs**), 21 staff units, the residual 194 bed Residential Aged Care Facility (**RCAF**), their visitors, service vehicles, allied health staff, the 5 shifts of (up to 70) staff, the 10 office and administration staff (together, the **Montefiore Development**) must enter or exit the Boronia Park precinct via Ryde Road or Pittwater Road.

3. The Environmental Capacity Limits within the Boronia Park precinct are already being exceeded.

4. An independent survey and assessment of the current traffic volumes and patterns and the expected impact of the NSW Government's Low and Mid-Rise Housing Policy on traffic entering, exiting and moving within the Boronia Park precinct ought to have been undertaken and its results considered.

5. The projected additional traffic movements which will be generated by the Montefiore Development, when added to the existing traffic volumes, will mean that the volumes of traffic movements entering, exiting and moving within the precinct will exceed the Environmental Capacity Limit and, in all but one instance, will exceed the Maximum Environmental Capacity Limit for the precinct.

6. The Montefiore Development is too large. The Montefiore Planning Proposal ought to be rejected.

Discussion

The expected impact of the Montefiore Planning Proposal on traffic is a function of 3 factors:

- **A. The Environmental Capacity Limits** for the Boronia Park precinct through which all traffic to and from the Montefiore site will travel;
- **B. The Existing Traffic Levels** in the Boronia Park precinct; and
- **C. The Expected increase in traffic** caused by the Montefiore Development.

The Draft Local Area Traffic Management Plan dated 15 June, 2021.

Hunters Hill Council commissioned a Draft Local Area Traffic Management Plan (the **DLATMP**) for part of the Boronia Park precinct. The DLATMP provides the only data which is available. The DLATMP was received by council in May, 2021 and a revised version was published on 15 June, 2021, though was never finalised[1].

The Draft LATMP was prepared by ptc. (consultants engaged by Hunters Hill Council) for a different purpose:

[1] A copy of the DLATMP is attached.

> *The study was undertaken in response to feedback from various sources and increasing apprehension in relation to safety and decreased amenity on local roads by residents. Population growth and subsequent traffic congestion on the classified road network has meant that the local roads may be seen as an alternative and the existing traffic management infrastructure is not meeting the needs of the community.*[2]

Changes affecting traffic since the DLATMP 2021 was published

Since the Boronia Park precinct traffic volumes was surveyed for the DLATMP there have been 3 significant changes, each of which has affected or will affect the traffic volumes.

The first is the NSW Government's ***Low and Mid-Rise Housing Policy*** which came into effect on 28 February, 2025. The stated purpose of these changes is to encourage more low and mid-density housing to be built within 800 metres from nominated town centres, such as the Boronia Park shops on Pittwater Road.

The impact will be felt in that part of the Boronia Park precinct which is bounded by Pittwater Road, High Street, Barons Crescent, Park Road and Ryde Road. As housing density increases – which is the object of the policy change – the volumes of traffic entering and exiting and moving within the Boronia Park precinct will increase from those which are presented in the DLATMP.

The second is the development of the ***Boronia Park Sports and Community Facility*** which is located on Park Road between Boronia Park Ovals 1 and 2. This Facility did not exist at the time that the DLATMP traffic surveys were conducted. It follows that the impact of traffic generated by this Facility within the Boronia Park precinct should also be considered.

Hunters Hill Council's website describes the Facility as follows:

> *Located in the centre of the Boronia Park Ovals, it offers breathtaking views of the harbor foreshore and the surrounding bushland from its terrace. Featuring modern and accessible amenities**, the venue is perfect for hosting a wide range of events and celebrating special occasions.***
>
> ***The facility accommodate(s) up to 150 people in the upper level indoor community space and terrace.***
>
> ***The building can be used for weddings, birthdays and private celebrations before 5pm. Community groups will also be able to book the facility from:***
>
> - ***6am to 10pm Monday to Saturday***
> - ***7am to 5pm Sunday***
>
> ***Public toilets are open from 7am to 3:45pm every day****.* (Emphasis added)

Each time a person travels by motor vehicle to the Facility to attend an event or even to use the facilities, additional traffic is generated in the Boronia Park precinct.

The third relates to Hunters Hill Council's decision in 2024 to construct maintenance facilities between Boronia Park Ovals 2 and 3. The stated purpose of the new maintenance facilities was for the storage of Council's routine maintenance equipment such as tractors, utilities and lawn mowers

[2] DLATMP at p.1

as part of Council's decentralised operating model.[3] To accommodate the projected increased usage by service and other vehicles, Council has also upgraded the road and surface and drainage along Princess Street to the east of Park Road and installed traffic control boom gate at the corner of Park Road and Princess Street.

The traffic impacts associated with:

- the NSW Government's *Low and Mid-Rise Housing Policy*,
- the *Boronia Park Sports and Community Facility* and
- the adoption of a decentralised operating model resulting in the construction of maintenance facilities and road and access upgrades

have not been considered.

The issues of safety and decreased amenity related to population growth, traffic congestion and the use of local roads within the Boronia Park precinct as alternatives to Pittwater Road and Ryde Road continue today.

The Montefiore Development will generate additional vehicle movements to, from and within the Boronia Park precinct.

The current traffic volumes have not been surveyed. No independent analysis has been undertaken.

Instead, Montefiore's Traffic Impact Assessment (the **Montefiore TIA**) relies selectively on data sourced from the DLATMP. Unfortunately, the selective use of data and the omission of other data distorts the true position.

A The Environmental Capacity Limit(s)

The first factor to be considered is the capacity limit(s) for the surrounding roads which will be affected. The forecast traffic volumes ought not to exceed the environmental capacity limits for the Boronia Park precinct.

The Montefiore TIA incorrectly states that

> *.. the Environmental Capacity for these segments of local roads is 300 vehicles.*[4]

This statement is incorrect. The DLATMP correctly states:

> ***Local Road*** *200 environmental goal*
> *300 maximum*
> *High Street between Pittwater Road and Farnell Street is the only location where these limits are exceeded in the study area.*[5]

It is important to note that:

1. the DLATMP clearly states that the environmental capacity limits **are already exceeded on** High Street between Pittwater Road and Farnell Street**;**

[3] Hunters Hill Council, *New maintenance shed at Boronia Park;* 22 September, 2024.

[4] TIA s.2.3.4.

[5] DLATMP at p.13.

2. the traffic volume data which is reported in the DLATMP likely understates the actual traffic volumes due to the impact of Covid 19 restrictions on traffic volumes (discussed below); and

3. this is **before** the impact of the additional traffic generated by the Montefiore Development is considered.

B The Existing Traffic Levels

The second factor to be considered is the existing traffic volumes in the Boronia Park precinct.

The council has previously responded to community concerns about traffic congestion, road safety and decreased amenity arising from the prevailing practice of "rat running" between Pittwater Road and Ryde Road which has increased traffic volumes in the Boronia Park precinct. This led council to commission the DLATMP.

Montefiore has not undertaken a fresh survey to determine the current traffic levels. Instead, the Montefiore TIA refers to some, though not all, of the traffic volumes data which is presented in the DLATMP.

During the protracted period of consultation and assessment the Department of Planning, Housing and Infrastructure (**DPHI**) in its assumed capacity as Local Plan Making Authority ought to have required that a fresh survey of existing traffic volumes within the Boronia Park precinct be undertaken. This would have established a current baseline. It is regrettable that the DPHI has not obtained a fresh survey of current traffic volumes.

In the absence of a fresh survey of current traffic volumes, the only data which is referenced is the data presented in the DLATMP.

The true picture of the raw traffic volume data which is presented in Tables 5 and 6 of the DLATMP is shown in the following table.

Table 1 Traffic Volumes entering/exiting the Boronia Park precinct - raw DLATMP data

Traffic volumes entering the precinct via Pittwater Road – weekday evening peak hour	263 vehicle movements – exceeds environmental capacity limit
Traffic volumes exiting the precinct via Pittwater Road – weekday evening peak hour	146 vehicle movements
Traffic volumes entering the precinct via Pittwater Road – weekday morning peak hour	160 vehicle movements
Traffic volumes exiting the precinct via Pittwater Road – weekday morning peak hour	326 vehicle movements – exceeds maximum environmental capacity limit
Traffic volumes entering the precinct via Ryde Road – weekday evening peak hour	168 vehicle movements
Traffic volumes exiting the precinct via Ryde Road – weekday evening peak hour	182 vehicle movements
Traffic volumes entering the precinct via Ryde Road – weekday morning peak hour	196 vehicle movements
Traffic volumes exiting the precinct via Ryde Road – weekday morning peak hour	159 vehicle movements

In two instances, the environmental capacity limit – 200 vehicles per hour[6] – is exceeded. In one instance, the environmental capacity maximum – 300 vehicles per hour – is exceeded.

There are two important shortcomings with using the data reported in the DLATMP to establish the existing traffic levels.

Impact of Covid 19 restrictions on reported traffic volumes data

In the period in which the DLATMP was being studied, Sydney was subject to Covid 19 restrictions. Those restrictions reduced the levels of traffic movements throughout Sydney, including the numbers of vehicles entering and exiting the Boronia Park precinct.[7]

To understand the true picture of the existing traffic volumes entering and exiting the Boronia Park precinct, it is necessary to adjust the DLATMP data to allow for the impact of the Covid 19 restrictions.

Andrew Constance, the then NSW Government Transport Minister, stated:

> *During COVID-19, travel on the road network across Sydney has declined by around 55 percent; however, we have seen a slight increase in recent days.*[8]

The Australian Automobile Association gave a similar estimate of the impact of Covid lockdown restrictions:

> *Government data shows traffic volumes have halved across Sydney during the peak of the COVID-19 lockdown restrictions on traffic flows;*[9]

It is highly likely that the traffic volumes data which is reported in the DLATMP understates the traffic volumes during more normal times by a factor of 50-55 percent.

When the raw DLATMP data is adjusted to remove the impact which the Covid 19 restrictions had on traffic volumes, the normalised results are shown in Table 2.

Table 2 Traffic Volumes entering/exiting the Boronia Park precinct - DLATMP data adjusted to allow for the impact of Covid restrictions (50-55% decline)

Traffic volumes entering the precinct via Pittwater Road – weekday evening peak hour	478 vehicle movements - exceeds maximum environmental capacity limit
Traffic volumes exiting the precinct via Pittwater Road – weekday evening peak hour	265 vehicle movements - exceeds environmental capacity limit
Traffic volumes entering the precinct via Pittwater Road – weekday morning peak hour	291 vehicle movements - exceeds environmental capacity limit
Traffic volumes exiting the precinct via Pittwater Road – weekday morning peak hour	593 vehicle movements - exceeds maximum environmental capacity limit
Traffic volumes entering the precinct via Ryde Road – weekday evening peak hour	305 vehicle movements - exceeds maximum environmental capacity limit

[6] DLTAMP at p.13.
[7] The DLATMP is dated 15 June, 2021. The methodology used to collect traffic volume data was tube counters placed at mid-block locations. Although the DLATMP does not state when the traffic volumes data was collected, the document refers to the Boronia Park Plan of Management which was developed in May 2020.
[8] Tom Rabe and Nigel Gladstone: *The impact of coronavirus lockdown on Sydney's busiest roads*. Sydney Morning Herald, 13 May, 2020.
[9] Australian Automobile Association Media Release: *Empty streets help drive down the nation's road toll.* 31 July, 2020.

Traffic volumes exiting the precinct via Ryde Road – weekday evening peak hour	330 vehicle movements – exceeds maximum environmental capacity limit
Traffic volumes entering the precinct via Ryde Road – weekday morning peak hour	356 vehicle movements - exceeds maximum environmental capacity limit
Traffic volumes exiting the precinct via Ryde Road – weekday morning peak hour	289 vehicle movements - exceeds environmental capacity limit

In each instance, the environmental capacity limit – 200 vehicles per hour – is **exceeded.** In five instances, the environmental capacity maximum – 300 vehicles per hour – is **exceeded.**

The actual (current) weekday traffic volumes entering and exiting the Boronia Park precinct via Pittwater Road and Ryde Road appear consistent with, if not higher than, the volumes which are calculated in Table 2.

The Montefiore TIA is unreliable

The Montefiore TIA omits the reported traffic volume data from the two State Roads which bring traffic to the Boronia Park precinct. The reported Weekday Morning Peak Hour traffic volumes which are reported in Figure 5 of the DLATMP[10] have simply been ignored. This data shows that traffic volumes along High Street between Pittwater Road and Farnell Street during the morning peak already exceed the environmental capacity limits.

The Montefiore TIA assesses[11] the forecast traffic volumes during the "Network Peak Period" by reference to Park Road only - that is, no data relating to traffic flows from Pittwater Road via High Street is included. This ignores traffic which is entering or exiting the Boronia Park precinct via Pittwater Road and High Street.

The Montefiore TIA derives "Site Peak" traffic volumes by applying a novel "reduction factor" to the (already unreliable) "Network Peak" traffic volumes.

The Montefiore TIA concludes that:

> *.. the development will not result in exceeding the environmental capacity limits on the local roads **immediately surrounding** the site and the traffic generated by the proposal can effectively be absorbed into the local road network .. and will not have a material effect on the surrounding community.*[12] (emphasis added).

This conclusion is at odds with the conclusion which is stated in the DLATMP that the volume of traffic entering High Street from Pittwater Road **already exceeded the environmental capacity limit.**[13] The traffic which is generated by the Montefiore Development will add to the excess.

The conflict between the conclusions which are actually reached in the DLATMP and those which are reached in the Montefiore TIA (and which are based on the same DLATMP) is reconciled by the subtle inclusion of the rider *on the local roads **immediately surrounding** the site.*

This conclusion is unreliable for two reasons.

[10] *Figure 5 Weekday morning peak hour traffic volumes,* at p.11.
[11] TIA Table 10.
[12] TIA, s.4.3.4 Environmental Capacity Assessment.
[13] DLATMP at p.13.

First, while it is true that every vehicle which travels to the site will travel along the *immediately surrounding roads*, it is also true that every vehicle will enter and exit the Boronia Park precinct via either Pittwater Road or Ryde Road and travel along either High Street or Park Road to reach those *immediately surrounding roads*. The traffic impacts of the Montefiore Development will not be limited to the roads which *immediately surround* the site – those impacts will be felt throughout the Boronia Park precinct.

Second, to the extent that the Montefiore TIA's conclusion relates to the local roads which immediately surround the site, there is no traffic volume data available. The data which is presented in the DLATMP does not extend past the blocks which are bounded by Pittwater Road, High Street, Park Road and Ryde Road.

C The Expected increase in traffic volumes

The third factor to be considered is the expected additional traffic which will be generated by the Montefiore Development.

The Montefiore TIA states:

> *The Masterplan indicates the provision of 205 (parking) spaces at a single basement level and an additional 13 on grade (total 218). Notably this is an indicative figure that could be increased through the provision of additional part basement level to meet ultimate parking demands.*[14]

These 218+ additional parking spaces will predominantly be for the residents of the ILUs and the 21 staff units[15] and their visitors. The traffic movements to and from these ILUs and staff units will add to the existing traffic volumes in the Boronia Park precinct.

To the extent that the site is also used for other purposes, such as allied health services, a restaurant and a café, there will also be further additional vehicle movements to and from the site. Montefiore has provided no information about these other possible uses and the traffic which will be generated by them. No assessment is provided in the documents which have been exhibited.

How to determine the expected additional traffic generated by the Montefiore Development?

How to accurately forecast the expected increase in traffic volumes is very important.

The expected rate of additional traffic which will be generated by the Montefiore Development has been calculated by multiplying the number of new dwellings by a per dwelling rate traffic generating factor.

What is the number of new dwellings which is proposed?

This is important for an obvious reason – the greater the number of new dwellings, the greater the expected increase in traffic volumes entering and exiting the Boronia Park precinct.

The actual number of planned ILUs is not clear:

- Buildings A, C and D are stated to comprise 112 ILUs;[16]

[14] TIA; *3 Planning Proposal 3.1 Overview.*
[15] Ibid.
[16] Ibid.

- Building B is assumed to comprise no ILUs, though include 3 floors, comprising 21 x 2 bedroom units[17];

however

- no reference is made to the number of ILUs, if any, which will be included within the 4 buildings in Gaza Avenue.

The calculations which are made in the Montefiore TIA assume that the number of ILUs will be 112.[18] However, these calculations do not include the number of dwellings which are planned to be included within the 3 two storey and one single storey buildings located in Gaza Avenue.

Montefiore should make clear whether the planned number of new dwellings is 112 or a greater number. If the Montefiore Development actually comprises more than 112 ILUs then it follows that the additional traffic generated will be greater than forecast.

Technical Direction TDT 2013/04a Guide to Traffic Generating Developments

The Montefiore TIA refers to the *NSW Government Technical Direction TDT 2013/04a Guide to Traffic Generating Developments* (**TDT 04a**)[19]. However, the references to the TDT 04a are highly selective. As a consequence, the conclusions which are reached in the TIA are skewed in ways which minimise the forecast increases in traffic volumes.

The Montefiore TIA uses trip generation rates which are significantly different from the TDT 04a

The TDT 04a states:

> ***Housing for Seniors***
>
> *Ten surveys were conducted in 2009, five within the Sydney urban area and five in regional New South Wales. Summary trip generation rates were as follows:*
>
> *Weekday daily vehicle trips = 2.1 per dwelling*
>
> *Weekday peak hour trips = 0.4 per dwelling*
>
> *(Note that morning site peak hour does not generally coincide with the network peak hour).*[20]

Whereas the TDT 04a states that Weekday peak hour trips represent 0.4 per dwelling, the Montefiore TIA assumes a traffic generation rate (for PM network peak) of 0.05 per dwelling. This is an eightfold variance.

The Montefiore TIA relies on data from a single seniors housing site and ignores other, less favourable, data from four other seniors housing sites in Sydney

The TDT 04a presents data from 10 seniors housing sites, five of which are within the Sydney urban area and five in regional New South Wales. The data which is presented reflects surveys which have been reported in a 2009 publication.[21]

---

[17] Ibid.
[18] TIA at *s.4.3.1 Traffic Generation*.
[19] A copy of TDT 04a is attached.
[20] NSW Government, Transport Roads and Maritime: *Technical Direction TDT 04a August 2013: Guide to Traffic Generating Developments,* at p.2.
[21] *Trip Generation and Parking Generation Surveys. Housing for Seniors, Analysis Report, Hyder for NSW Roads and Traffic Authority, June 2009.*

The survey data which is presented is at least 17 years old and, in the case of the single site which the Montefiore TIA references, approximately 20 years old. The reliability of data which reflects traffic generated by seniors housing in 2009 (or earlier) is questionable. However, as no independent assessment has been undertaken, it has been assumed that traffic volumes and patterns have not changed since 2009.

In the period following the original Gateway Determination (on 23 April 2024) the DPHI, in its assumed capacity as Local Plan Making Authority, ought to have considered whether traffic volumes and patterns relating to seniors housing in Sydney have changed. It is regrettable that the DPHI has not taken steps to obtain an independent assessment for this purpose.

To forecast the additional traffic volumes generated by the Montefiore Development, the Montefiore TIA has disregarded the traffic generation data for the 10 seniors housing sites which is presented in TDT 04a. Most relevantly, the Montefiore TIA has disregarded the traffic generation data for the 4 other seniors housing sites which are located in the Sydney urban area.

To forecast traffic generating rates for the Montefiore Development, the Montefiore TIA has selected data from a single site (identified as 'SH3'). The traffic generating data for this site is the lowest of the 5 Sydney area sites which are presented. This has the effect of minimising the forecast traffic to be generated.

Across the 5 Sydney area sites where data is presented, the traffic generating rates vary from a low of O.05 trips per dwelling (the rate which is being used in the Montefiore TIA) to 0.36 trips per dwelling (site SH 1). The average of the 5 sites is 0.176 trips per dwelling.

Relying solely on lowest traffic generation data (for SH3) minimises the volumes of expected traffic volumes. To illustrate:

- relying on the highest (SH1) rather than the lowest, would mean that the multiplier is 0.36 which (applying Montefiore's approach) produces an estimated increase in traffic of 0.36 x (112 ILUs + 21 staff units) = **48 additional traffic movements each hour during the Network PM peak**; and
- relying on the average of the 5 metropolitan sites rather than the lowest, would mean that the multiplier is 0.176 which (applying Montefiore's approach) produces an estimated increase in traffic of **23 additional traffic movements each hour during the Network PM peak.**

Applying the average traffic generation rate results in traffic volumes which further exceed the local environmental capacity in the Boronia Park precinct as shown in Table 3.

Table 3 Traffic Volumes entering/exiting the Boronia Park precinct – adjusted DLATMP data

(Table 2) plus average (23) additional traffic movements

Traffic volumes entering the precinct via Pittwater Road – weekday evening peak hour	478 + 23 = 501 vehicle movements – exceeds maximum environmental capacity limit
Traffic volumes exiting the precinct via Pittwater Road – weekday evening peak hour	265 +23 = 288 vehicle movements - exceeds environmental capacity limit
Traffic volumes entering the precinct via Pittwater Road – weekday morning peak hour	291+ 23 = 314 vehicle movements - exceeds maximum environmental capacity limit
Traffic volumes exiting the precinct via Pittwater Road – weekday morning peak hour	593 + 23 = 616 vehicle movements - exceeds maximum environmental capacity limit

Traffic volumes entering the precinct via Ryde Road – weekday evening peak hour	305 + 23 = 328 vehicle movements - exceeds maximum environmental capacity limit
Traffic volumes exiting the precinct via Ryde Road – weekday evening peak hour	330 + 23 = 353 vehicle movements - exceeds maximum environmental capacity limit
Traffic volumes entering the precinct via Ryde Road – weekday morning peak hour	356 + 23 = 379 vehicle movements - exceeds maximum environmental capacity limit
Traffic volumes exiting the precinct via Ryde Road – weekday morning peak hour	289 + 23 = 312 vehicle movements - exceeds maximum environmental capacity limit

In each case, the environmental capacity limit – 200 vehicles per hour – is **exceeded.** In all but one instance, the environmental capacity maximum – 300 vehicles per hour – is **exceeded.**

Concluding Remarks

The local roads within the Boronia Park precinct do not have sufficient capacity to cope with the additional traffic which will be generated by the Montefiore Development.

Richard Willcock (sgd)

12 January, 2026

Note: I request that my address and contact details not be made public.

Attachments

Hunters Hill Council, Draft Local Area Traffic Management Plan, 15 June 2021.

NSW Government, Transport Roads and Maritime: ***Technical Direction TDT 04a August 2013: Guide to Traffic Generating Developments***

Submission Type

I am making a personal submission

Title

Mr

First Name

Richard

Family name

Willcock

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

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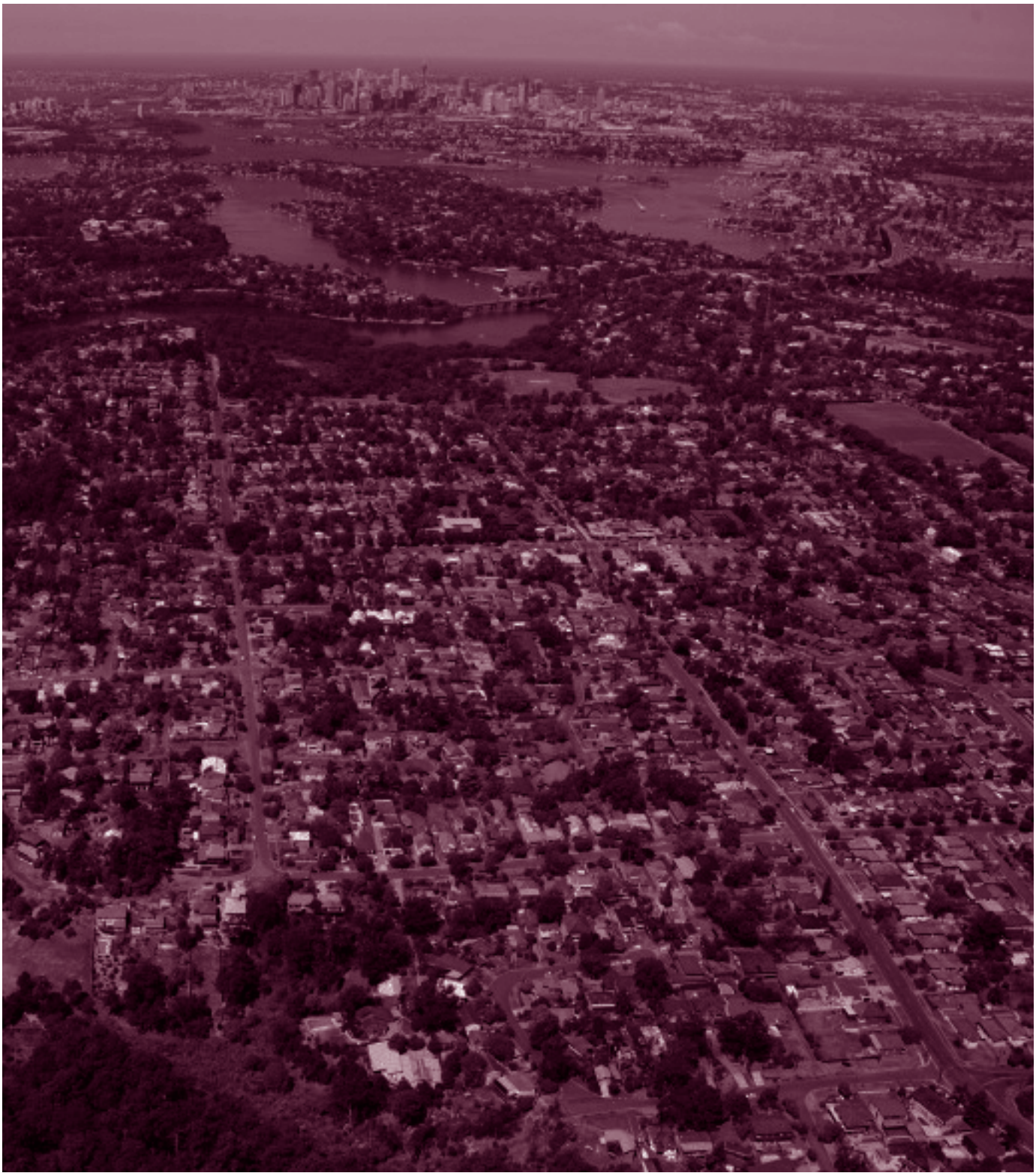
submission

This is the first of 2 attachments referred to in my accompanying Submission dated 12 January, 2026.



Boronia Park Precinct;

Draft Local Area Traffic Management Plan

For Hunter's Hill Council

15 June 2021

parking;
traffic;
civil design;
wayfinding;

ptc.

Document Control

Local Area Traffic Management Study; Boronia Park Precinct

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1 Introduction

ptc. has been engaged by Hunter's Hill Council to undertake a Local Area Traffic Management Study (LATMS) for the "Boronia" precinct. The study was undertaken in response to feedback from various sources and increasing apprehension in relation to safety and decreased amenity on local roads by residents. Population growth and subsequent traffic congestion on the classified road network has meant that the local roads may be seen as an alternative and the existing traffic management infrastructure is not meeting the needs of the community.

The following report provides a LATM Plan to address the concerns raised and presents an assessment of relevant background information, traffic data, community consultation surveys and an on-site investigation, Background

1.1 LATM Objectives and Process

In an attempt to not deal with local traffic problems in isolation from the community and network contexts in which they occur, this LATMS and resulting Plan is being shown in the wider context of the things that the community seeks to maintain and achieve. The desired outcomes of this study process are consistent with the other goals of local land use and community planning within the Hunter's Hill Local Government Area (LGA). The LATMS is facilitated by a broader strategic context which sets down visions and general processes for such things as:

- community values and goals
- amenity and environmental standards
- road safety targets
- development plans and standards
- level of service performance measures for the whole network
- integrated local transport commitments
- encouragement of walking and cycling

These will help to set the goals for LATM and define the more broadly based assessment criteria that will help in the decision process.

1.2 Local Planning Context

1.2.1 Local Environmental Plan

The Hunter's Hill Local Environmental Plan 2012 aims to make local environmental planning provisions for land in Hunter's Hill in accordance with the relevant standard environmental planning instrument under section 3.20 of the Act.

The specific aims of this Plan that are relevant to this study are:

- to maintain and enhance the character and identity of established neighbourhoods in Hunter's Hill by regulating the use and development of land,

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- to accommodate a range of housing that will maintain the garden suburb character of the municipality, while responding to the needs of a growing population and changing demographics,
- to consolidate housing growth in locations that are well-serviced by shops, transport and community services,
- to provide for employment and a variety of businesses that service residents of the municipality and surrounding areas,
- to maintain a network of open spaces that conserve natural and scenic qualities, as well as providing a variety of active and passive recreation opportunities for residents of the municipality and surrounding areas,
- to accommodate a range of community and educational infrastructure for residents of the municipality and surrounding areas,
- to promote high standards of urban and architectural design quality.

1.2.2 Development Control Plan

The Hunter's Hill Development Control Plan (HHDCP) includes detailed controls for all development within the LGA. It came into effect on 12 August 2013.

It ensures that development applications provide an evaluation of relevant impacts which are likely to be generated by future development having particular regard for Traffic.

The particular aims of this DCP that are relevant to this study are regarding streetscapes i.e. that the landscaping of public or communal streets should:

(i) Define a theme for new streets, or complement existing streetscapes.

(ii) Complement existing or desired functions of the street.

(iii) Reinforce desired traffic behaviour and speed.

1.2.3 Local Strategic Planning Statement

The Local Strategic Planning Statement (LSPS) is a 20 year plan to manage land use growth and change in the Hunter's Hill LGA until 2040 in light of community aspirations and broader economic, social and environmental matters. It sets out the strategic planning priorities for managing growth and change and will be a guide for land use planning and infrastructure delivery in the area.

In the LSPS, Council commits to working with TfNSW, as an action of the LSPS to progress their delivery of better bus and ferry services, parking on major roads in centres and to contribute to place-based planning outcomes. A balance between arterial road priority for through traffic (vehicles and public transport) and their role in shaping centre usage needs to be addressed as part of the place-based approach to planning of the LSPS. Council will work with Transport for NSW and in particular its Movement and Place team, to progress movement on the roads.

This commitment is something that will be relied on when dealing with strategies along Pittwater Road and Ryde Road.

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1.2.4 Boronia Park Plan of Management

A Plan of Management was developed in May 2020 to determine and guide the future management of Boronia Park. It sets out management objectives and performance targets for the community land as well as providing management and use direction and actions.

Some key issues raised in the development of the plan were:

- Traffic and parking congestion along Boronia Avenue on major game days and events
- Ryde Road playground impacted by traffic noise and fumes at heavy traffic periods

As a result, an action item was that all larger community or special events will be subject to Council's Events on Council Land, Sustainable Event Management and Playing Fields Bookings Policies or other policies and procedures as applicable and that such events will require Council approval—which may include special conditions around traffic and parking, vehicle access, temporary structures, food and alcohol, noise and lighting control, waste management, on-site security and crowd safety, bonds, insurance, and other issues.

1.2.5 Boronia Park Sports and Community Facility

Council is planning for a Sports and Community Facility at Boronia Park, a district-level sport, recreation and nature reserve. The purpose of the facility is to provide greater community amenity, enabling people of all ages, genders and abilities improved opportunity to participate, spectate and enjoy organised sport at Boronia Park.

It is expected a Transport Impact Assessment will accompany the DA that will assess the impacts on traffic and parking in the area associated with the proposed trip generation of the new facility. Accordingly, the LATM and effects on amenity will a major consideration.

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2 Study Area Characteristics

2.1 Characteristics of Study Area

Boronia is not officially a suburb of the Hunter's Hill LGA, but is a destination precinct and well known amongst residents and visitors. The study area is generally defined as a road grid bounded by Pittwater Road to the northwest, Ryde Road to the southwest, Boronia Park Reserve to the southeast and High Street to the northeast. The small peninsular to the northeast, bounded by Barons Crescent and High Street has also been included as it can only be accessed through the grid described above.

The Boronia Precinct is relatively self-contained with the commercial/shopping strip along Pittwater Road and Boronia Park Public School on Pittwater Road and the main generator/attractor and most recognised feature, Boronia Park Reserve to the east on the banks of Lane Cove River. The Precinct has large residential blocks and generally wide streets. In the late 1800's and early 1900's subdivision took place throughout the area, which saw an increase to the local population and lots of families moving to the area.

Figure 1: Boronia Park Precinct LATMS Area

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2.2 Road Hierarchy

2.2.1 Administrative Road Hierarchy

Transport for NSW (TfNSW) has adopted an administrative Road Hierarchy to manage the road network across NSW. The three administrative classes are:

- State Roads
- Regional Roads
- Local Roads

In terms of traffic management, Council has been delegated the responsibility for managing traffic on local and regional roads. TfNSW has an input into the local and regional road system through Council's Traffic Committee and through direct contact with Council. Changes to the local road system by Council which influence traffic flows require the submission of a Traffic Management Plan (TMP) to the TfNSW for approval. Although State Roads remain under the care and control of TfNSW, Council works closely with TfNSW to ensure that traffic on the State Road network does not adversely impact on the Regional or Local Road network to which it is responsible for.

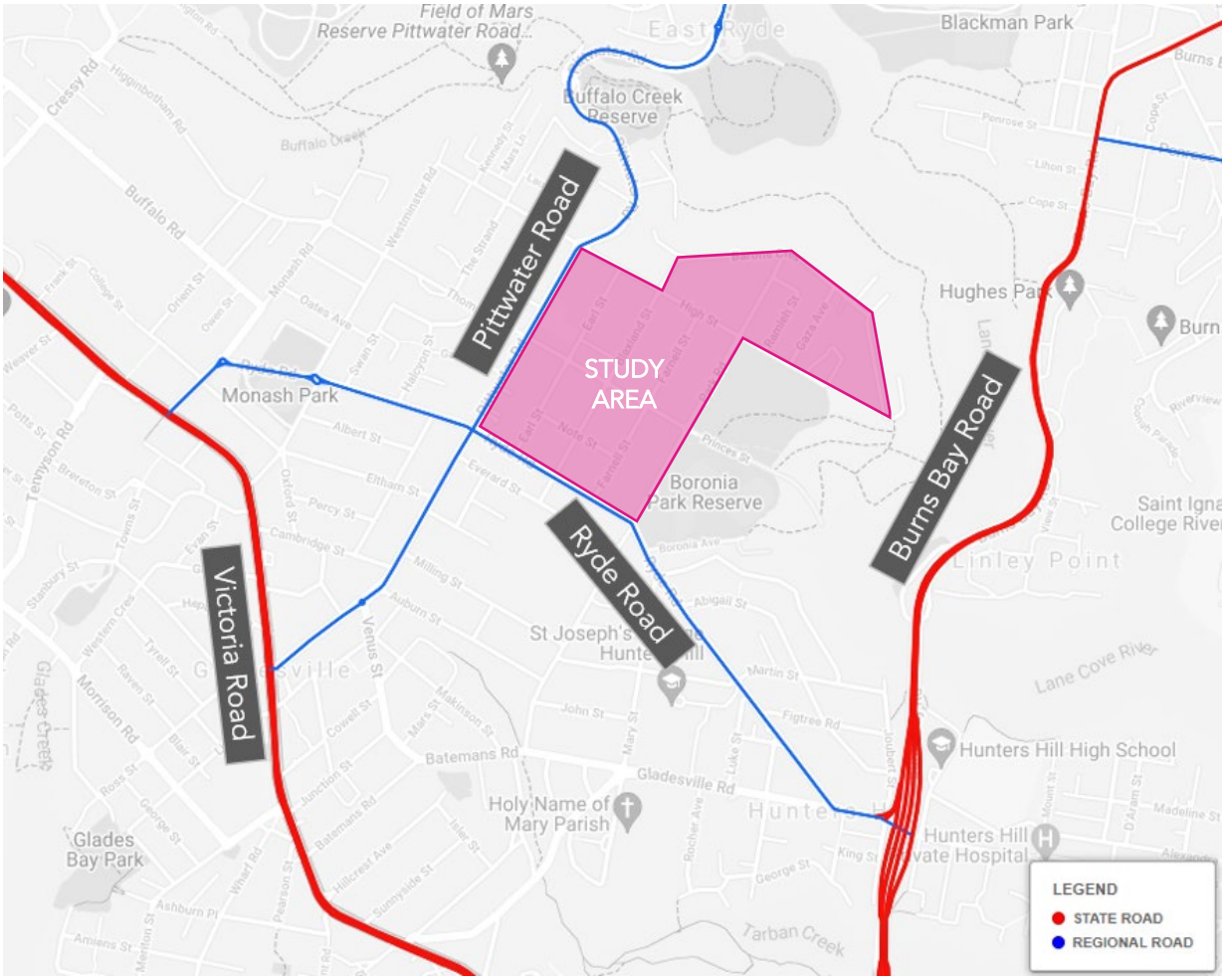

Figure 2: Road Hierarchy

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2.2.2 Functional Road Hierarchy

The functional classification of roads relates to their role within the overall road network. Changes to traffic flows on roads can then be assessed within the context of the functional road hierarchy. TfNSW has developed guidelines for functional classifications of roads. These guidelines are published in the document titled "The Functional Classification of Roads".

Council recognises the importance of defining the roles of roads within the overall road network and proposes to adopt the TfNSW Functional Classification of Roads. The four functional road classes are:

Arterial Road - typically a main road carrying in excess of 15,000 vehicles per day and over 1,500 vehicles per hour in the peak periods. They predominately carry traffic from one region to another, forming principal avenues for metropolitan traffic movements.

Sub Arterial Road – typically a secondary road carrying between 5,000 – 20,000 vehicles per day and over 500 and 2,000 vehicles per hour in the peak period. They predominately carry traffic from one sub-region to another forming secondary inter-regional transport links.

Collector Road – typically a minor road carrying between 2,000 and 10,000 vehicles per day and over 250 and 1,000 per hour in the peak period. They provide a link between local areas and regional areas carrying low traffic volumes. At volumes greater than 5,000 vehicles per day, residential amenity begins to decline. Trunk collector and spine roads with limited property access can carry traffic flows greater than 5,000 vehicles per day.

Local Road – typically a local street carrying less than 2,000 vehicles per day and 250 vehicles per hour in the peak period. They provide direct access to individual houses and carry low traffic volumes.

2.3 Active Transport

2.3.1 Walking

A Pedestrian Access and Mobility Plan (PAMP) provides a framework and a strategic list of actions for developing safe and more convenient pedestrian routes and fostering improvements in pedestrian mobility.

Council has completed a PAMP for Hunters Hill Village and Gladesville (jointly with City of Ryde).

A PAMP in the Precinct and specifically along Pittwater Road will help guide the priority of improvements to pedestrian accessibility and mobility in this key commercial area.

2.3.2 Cycling

In 2020 a review of Council's strategic Bike Plan was undertaken to ensure that Council's efforts are up-to-date, relevant and appropriate to the current planning and cycling infrastructure context.

Key objectives of the Plan within the local context were to:

- Develop the updated Bike Plan, taking into account Council's priorities, stakeholder input and the auditing of the existing cycleway network with reference to Council's renewable roads program.
- Develop a network of bicycle routes to meet the current and future community's needs including route maps, concepts etc.
- Identify any pinch points, intersection design issues or other site specific items and provide sketch plans of potential remedies.

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- Develop a cohesive bike network complementing existing facilities and providing consistent, logical links to regional routes and local destinations.
- Align the Bike Plan and actions with NSW Government plans and strategies
- Align the Bike Plan with NSROC Transport Strategies and neighbouring Councils' Bike Plans
- Align with Council's Local Strategic Planning Statement (LSPS)
- Provide an understanding of the cycling context in Hunters Hill and the connecting area
- Prepare a 4 year priority list of works, based on Council's forecasted budgeting
- Prepare a preliminary 5 to 10 year list of works, including indicative costings; and
- Audit the current condition and compliance with standards and guidelines of Council's existing bicycle network.

Figure 3 shows the future network in relation to the study area, based on the proposed implementation plan.

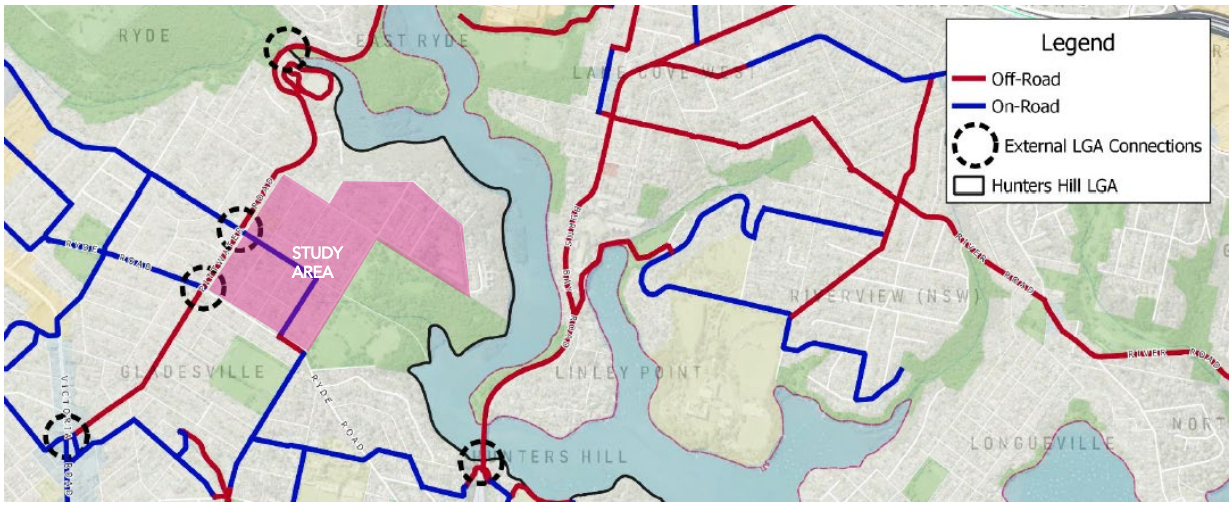

Figure 3: Future Cycling Network (source: Hunters Hill Bike Plan)

2.4 Public Transport

2.4.1 Bus Services

Hunters Hill LGA is well served by public transport, particularly for commuters to the Sydney CBD. Buses are easily accessed within the study area for local residents and workers, as shown in Figure 4.

Six bus routes travel through or around the study area and their frequency facilitates good access to Sydney and surrounding suburbs. Other local bus routes from Gladesville to Chatswood via Hunters Hill 536 and Gladesville to Woolwich 538.

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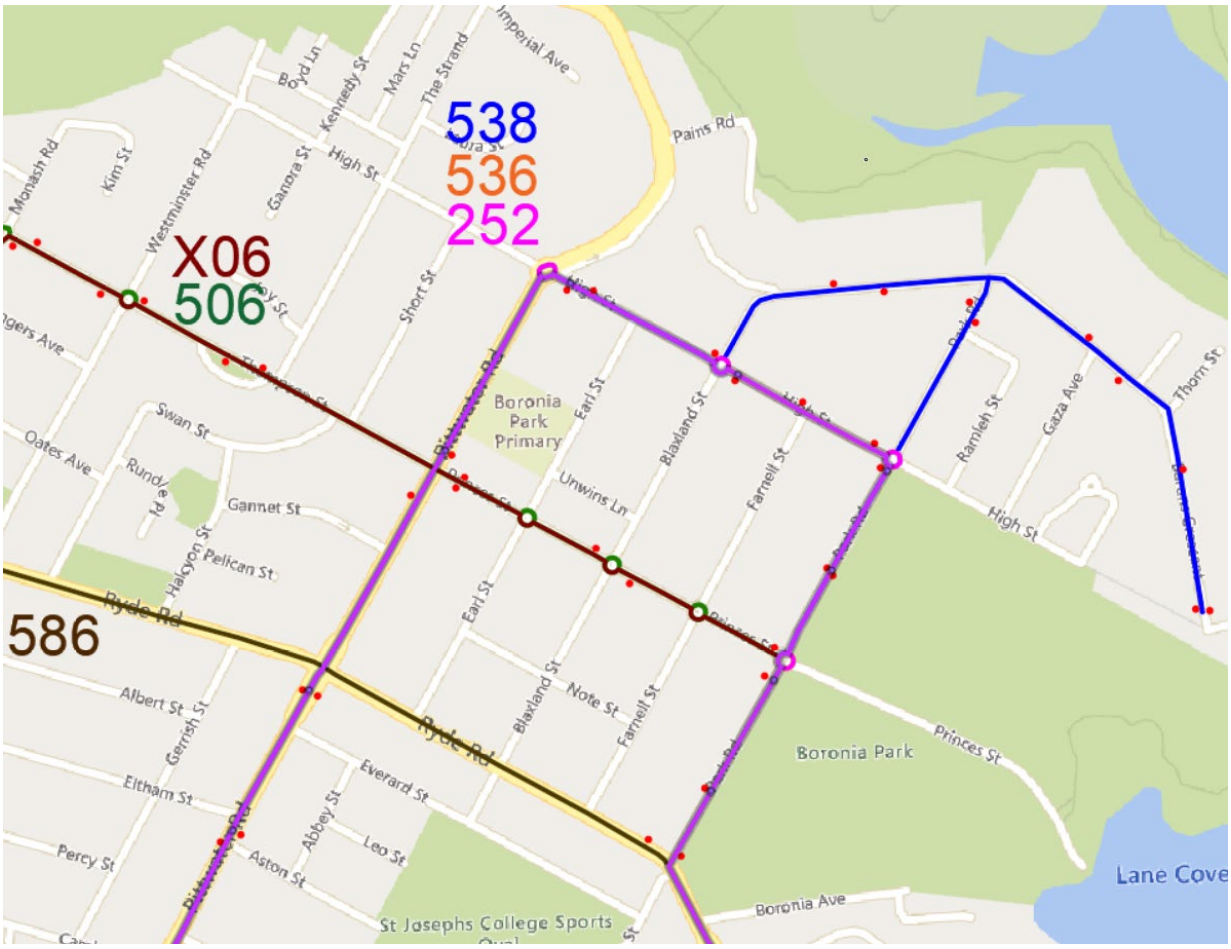

Figure 4: Local bus routes and stops

2.4.2 Ferry Services

There are two ferry wharves within the LGA that are serviced by Sydney Ferries—Huntleys Point Wharf and Woolwich Wharf. Convenient access to these two wharves is not provided from within the study area without travelling approximately 4-5km.

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3 Data Collection and Problem Identification

The primary uses of data in LATMS are to:

- help to define and quantify the nature and extent of the problems
- provide input information for developing strategies and countermeasures
- form the basis of an assessment of alternatives and post-assessment of the implemented scheme
- develop modifications to the plan or design of elements

The scope of data collection extends beyond the immediate study area to allow for the effects of and on conditions in surrounding areas being assessed.

The data collected mostly relates to road and traffic conditions. However, there was also a need to have community information to assist in anticipating difficulties and responses from specific groups of people and to help design the participation program and materials.

The Environmental Capacity of an area is determined by the impact of traffic, roads and various aspects of the location and a major consideration of this LATMS. Several factors affect the Environmental Capacity, including:

- Traffic characteristics:
  - traffic volume
  - traffic composition, in particular the proportion of heavy vehicles
  - vehicle speed
- Road characteristics:
  - road reserve and carriageway width.
  - number of traffic lanes.
  - gradient.
  - road surface condition.
- Locality characteristics:
  - distance from road carriageway to property boundary.
  - nature of intervening surfaces.
  - setback of building from property boundary.
  - type and design of building.

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3.1 Data Collected

Table 1 identifies the types of data collected as part of this LATMS and the purpose for which analysis has been conducted.

Table 1: Types of data collected

Data	Purpose
Traffic volumes	To compare with adopted maxima and to calculate peaking percentage. Traffic levels may constrain the types of devices that can be considered.
Traffic composition (vehicle types)	To identify problems with specific vehicle types, e.g. commercial vehicles.
Crashes	To identify problem locations and for use in determining warrants and priorities. A major input for before and after assessments. Note that local information may indicate the extent of unreported crashes.
Road inventory and other existing infrastructure	To provide information on existing infrastructure, road furniture, street planting, driveways, etc. on streets, to flag possible major maintenance or reconstruction works, and to provide site design information.
Origin/destination surveys	To identify through traffic proportions and provide input data for estimates of traffic changes resulting from the scheme.
Traffic speeds	To identify speed problems and potential crash situations. To provide information about free speeds for use in speed-based design.
Travel times and delays	To provide information about the external connectivity of the local street system. To monitor changes in travel times for travel within, through and around the study area, and the quality of access into and out of the area.
Level of Service	To establish how various measures (such as mobility, access, safety and amenity) combine to satisfy the needs of various road users.
Bus routes (existing and potential)	To identify problems for operators and specify design requirements for treatments.
Pedestrian volumes, desire lines and activity	To provide information on the location, number, strategic linkages, and design of devices and how these may influence pedestrians' use of space, including social interaction and street life.
Cyclist volumes, desire lines and parking	To provide information on the location, number, strategic linkages and design of facilities and how these may influence cyclists' travel and parking needs.
Parking	To identify parking-related problems and provide design data.
Community survey	To provide feedback based on local knowledge on issues in the study area

3.2 Traffic volumes

Tube counters were placed at most of the mid-block locations within the study area and the results shown in Figure 5 to Figure 7 were considered in conjunction with the other data sources.

The results demonstrate disproportionate volumes that identify rat runs confirmed by the OD surveys. Also, volumes along Pittwater Road and Ryde Road are not as high as expressed by the local community.

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Figure 5: Weekday morning peak hour traffic volumes

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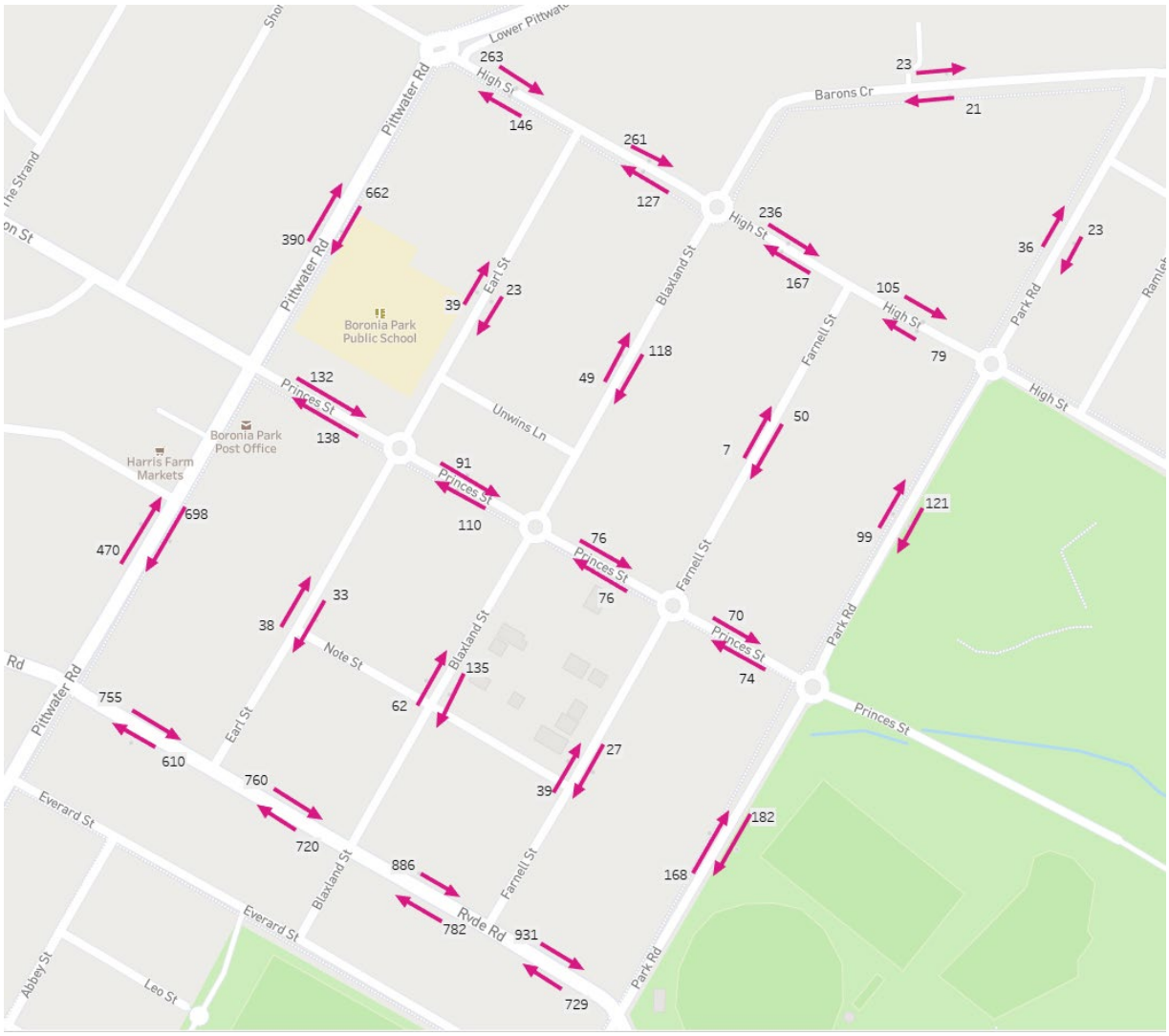

Figure 6: Weekday evening peak hour traffic volumes

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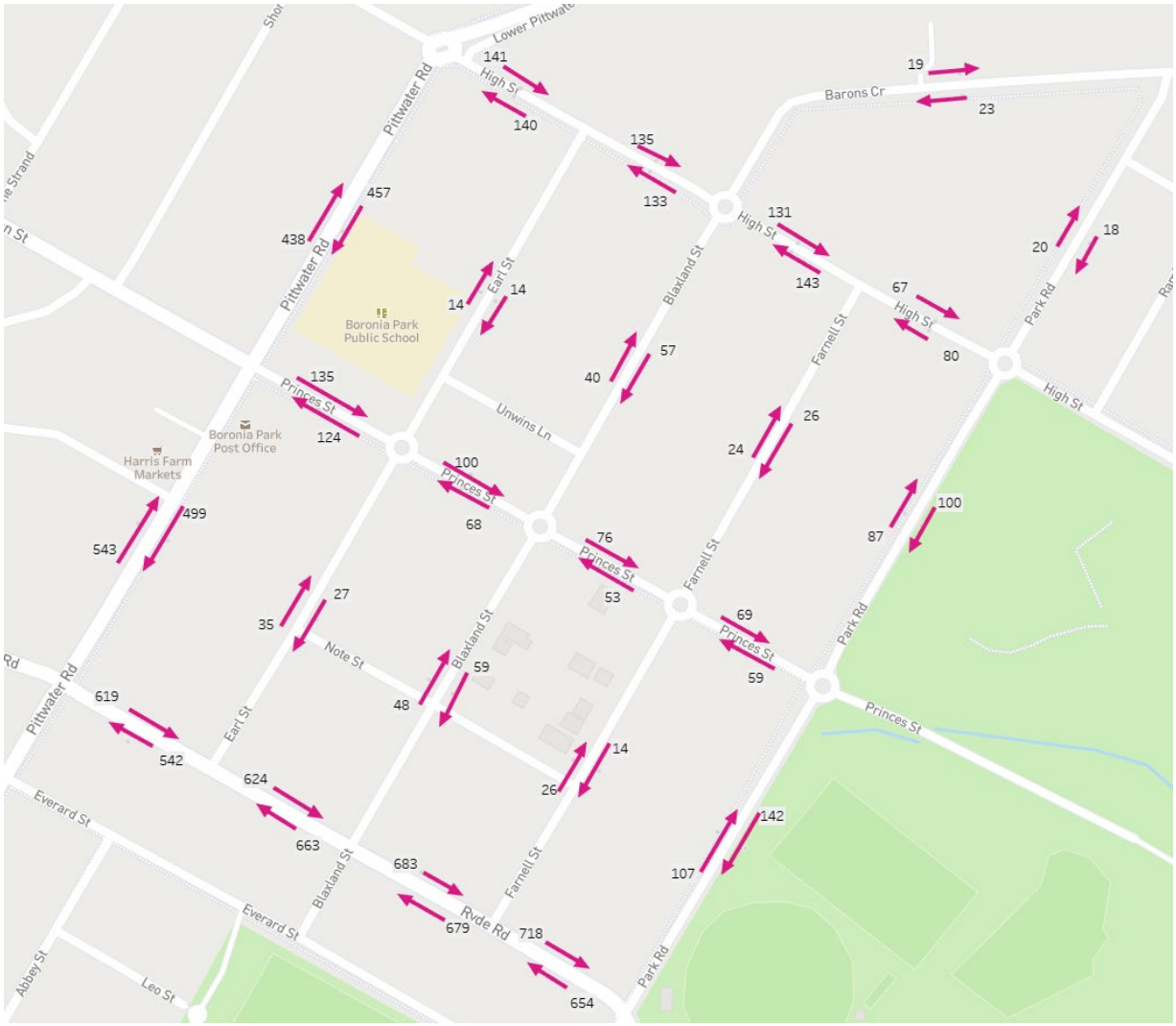

Figure 7: Saturday peak hour traffic volumes

Traffic limits are necessary on minor roads as pedestrian safety on these roads is a primary concern. Environmental capacity considerations are relevant to streets in residential areas, neighbourhood shopping centres and educational precincts. Each of the roads in the study area, other than Note Street and Unwins Lane can be classified as either a Local or (Local) Collector Road as they provide link between local areas and regional areas carrying low traffic volumes. The following Environmental capacity performance standards on residential streets are provided by TfNSW:

Local Road:	200 environmental goal	**Collector Road:**	300 environmental goal
	300 maximum		500 maximum

High Street, between Pittwater Road and Farnell Street is the only location where these limits are exceeded in the study area.

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3.3 Crashes

An analysis of the TFNSW crash database shows that over the past five years, locations for crashes have been almost exclusively limited to Pittwater Road, Ryde Road and High Street with the frequency decreasing each year.

The types of crashes also do not indicate a particular type of issue that can be mitigated by treatment or enforcement.

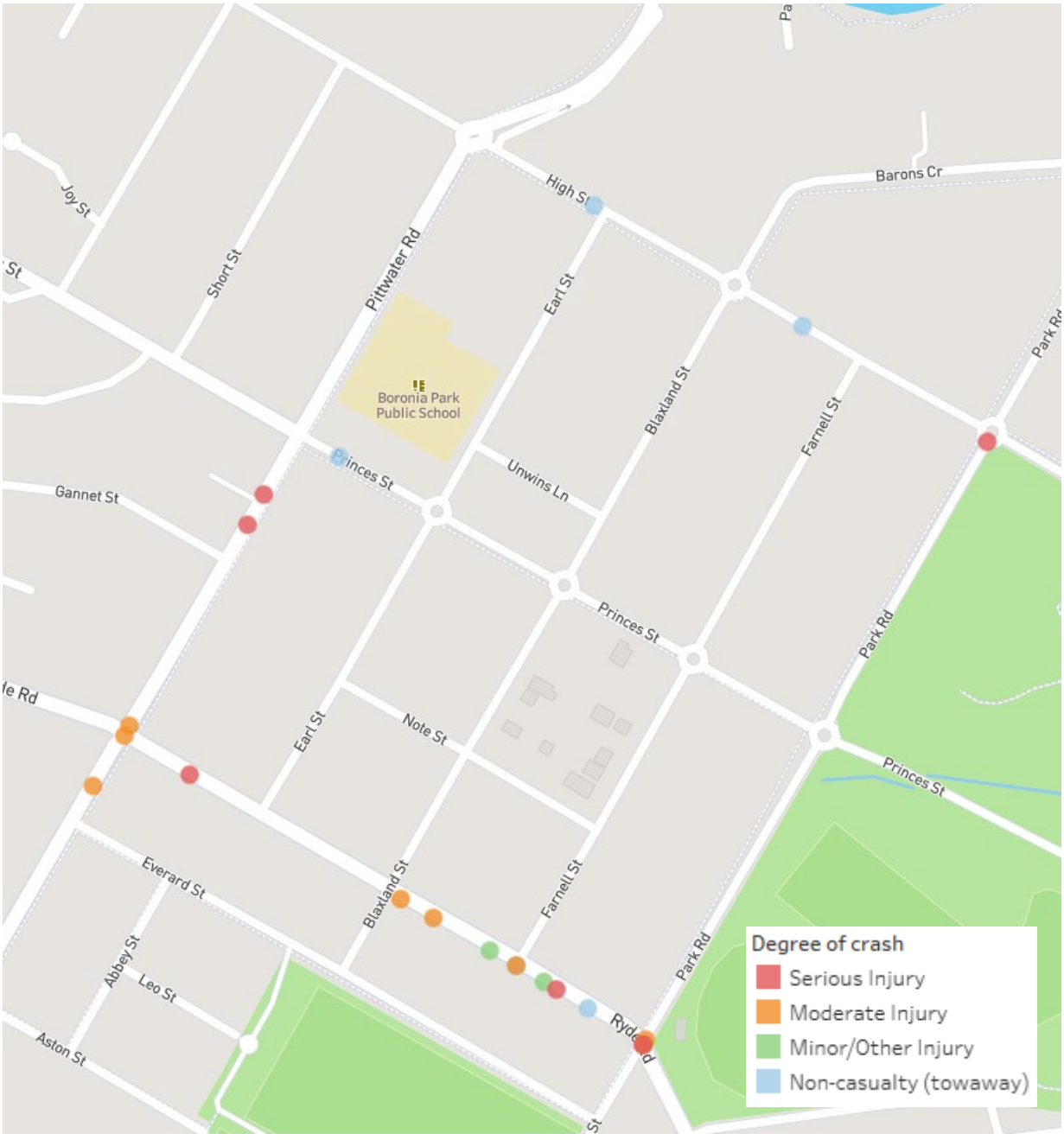

Figure 8: Five year crash history (source: TfNSW crash database)

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Table 2: Crash analysis

Year	Crash ID	Degree	Description	Type	Lighting	Injured	Killed
2015	1063972	Moderate Injury	Right near	T-junction	Dusk	2	0
	1066863	Minor/Other Injury	Off rd left => obj	2-way undivided	Daylight	1	0
	1070431	Non-casualty (towaway)	Off rd left => obj	2-way undivided	Daylight	0	0
	1070933	Moderate Injury	Off rd left => obj	2-way undivided	Daylight	1	0
	1075683	Moderate Injury	Off rd left => obj	2-way undivided	Daylight	1	0
	1076593	Serious Injury	Lane sideswipe	2-way undivided	Darkness	1	0
	1082188	Serious Injury	Off left/rt bnd=>obj	X-intersection	Daylight	1	0
	1087449	Minor/Other Injury	Rear end	2-way undivided	Daylight	2	0
	1088771	Moderate Injury	Rear End	X-intersection	Dusk	2	0
2016	1104259	Non-casualty (towaway)	Rear end	T-junction	Dusk	0	0
	1109593	Serious Injury	Ped other	2-way undivided	Daylight	1	0
	1115059	Moderate Injury	On road-out of cont	2-way undivided	Darkness	1	0
	1116259	Non-casualty (towaway)	Off rd left => obj	2-way undivided	Darkness	0	0
2017	1126568	Moderate Injury	Off left/rt bnd=>obj	T-junction	Darkness	1	0
	1136797	Moderate Injury	Left far	X-intersection	Daylight	1	0
	1146984	Non-casualty (towaway)	U turn	2-way undivided	Daylight	0	0
	1149612	Serious Injury	Lane change right	2-way undivided	Daylight	1	0
	1150884	Moderate Injury	Rear end	X-intersection	Daylight	1	0
2018	1176019	Serious Injury	Other manoeuvring	Roundabout	Darkness	1	0
	1178626	Non-casualty (towaway)	Off end of road	T-junction	Darkness	0	0
	1184187	Serious Injury	Ped on carriageway	2-way undivided	Darkness	1	0
2019	1195360	Non-casualty (towaway)	Off rd left => obj	2-way undivided	Daylight	0	0
	1218312	Non-casualty (towaway)	Off rd rght => obj	T-junction	Darkness	0	0

Compared with other local areas in NSW the study area has a relatively low crash rate, decreasing each year (2 in 2019), with no clear trends.

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3.4 Parking Facilities

3.4.1 Restricted Parking Controls Operations

Council operates parking controls across the LGA. The three main types within the study area are 12P, 30 minute, 10 minute, as well as the school drop-off/pick-up zone and no parking zones shown in Figure 9.

Figure 9: Parking restrictions

3.5 Existing LATM Devices

Most of the existing LATM devices in the study area (shown in Figure 10) have been installed some time ago and have not been constructed to the relevant guidelines and standards. Therefore, the poor geometry, signage and delineation is contributing to the lack of performance.

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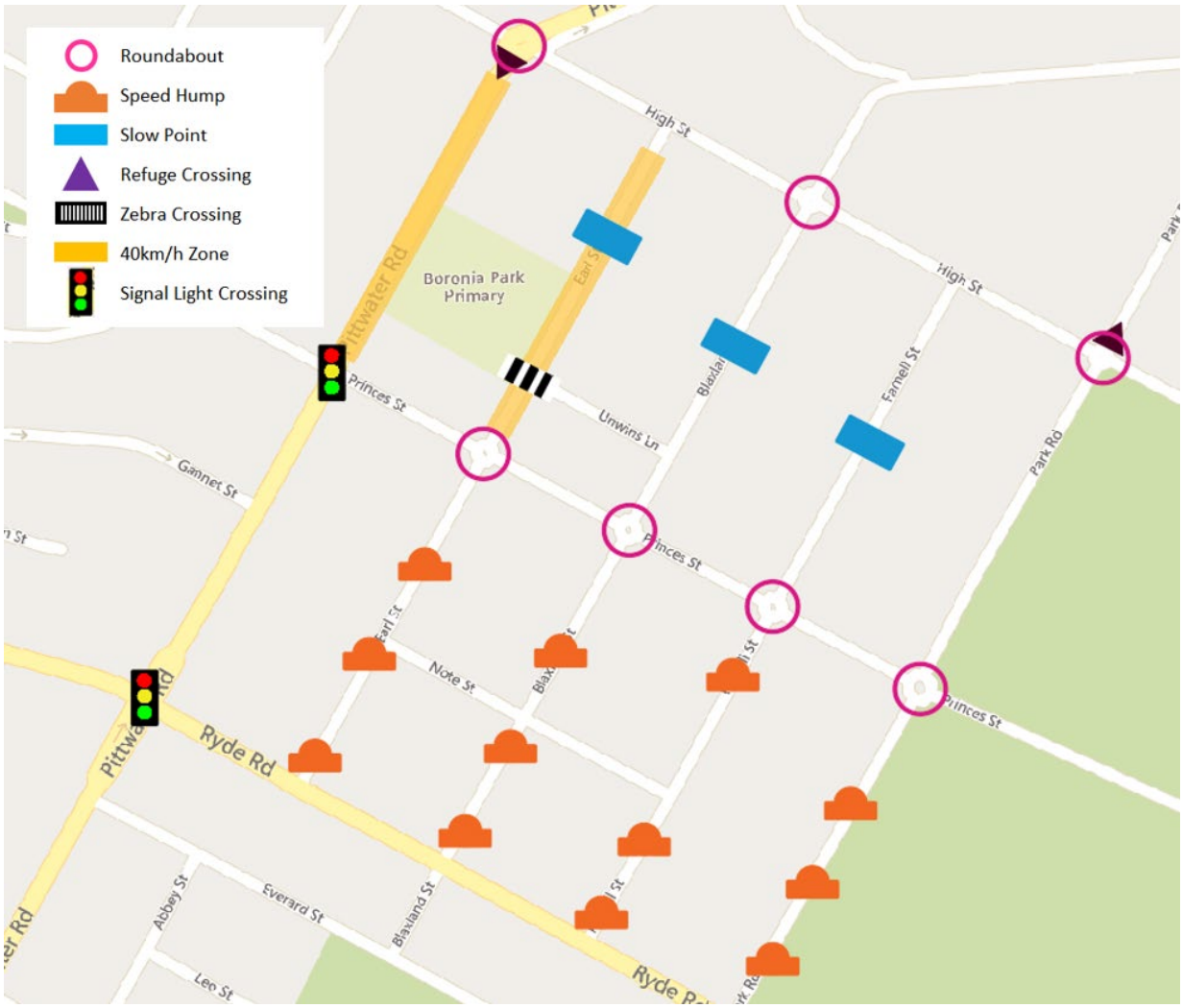

Figure 10: Existing LATM Devices

3.5.1 Roundabouts

The seven roundabouts within the Precinct serve two main purposes. The three along High Street are primarily for traffic management to facilitate traffic movements to and from the classified road network, whereas the four along Princes Street would likely mainly be for traffic calming as the peak volumes are not high enough to cause delays that would warrant an upgrade from priority controlled intersections.

The roundabout at the intersection of Pittwater Road/High Street has an elongated central island to achieve the deflection required to slow traffic and create gaps. 29 comments/likes/dislikes were received commenting specifically on the ineffectiveness of the roundabout in deterring rat runners along High Street. It is recommended that further analysis be conducted in consultation with TfNSW to determine whether an alternative design would be more appropriate.

The other two roundabouts along High Street are not designed in accordance with current standards and guidelines, likely to prevent acquisitions, reduce costs and minimise impact on street parking. They are both

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mountable due to the bus route. However, this also adds to their ineffectiveness in managing traffic and deterring rat runners.

3.5.2 Speed Humps

There are 12 speeds humps within the precinct, all south of Princes Street. None of these are designed to current standards and guidelines with generally poor delineation and visibility. The surveys demonstrate that the 85th percentile speed is below 50km/h. However, maximum speeds of 59 km/h, 68 km/h and 73 km/h were recorded in Earl Street, Blaxland Street and Farnell Street (south of Princes Street) respectively. This indicates that spacing and vertical deflection of these devices is not sufficient.

3.5.3 Slow Points

There are 3 existing slow points within the precinct, on Earl Street, Blaxland Street and Farnell Street, between High Street and Princes Street. None of these are designed to current standards and guidelines with poor delineation, visibility and no effective horizontal deflection and narrowing—required to reduce speeds.

The surveys demonstrate that the 85th percentile speed exceeds 50 km/h in these locations with maximum speeds approaching 70km/h.

3.5.4 Pedestrian Facilities

The pedestrian facilities in the Precinct are associated with Boronia Park Public School (zebra crossing) and in pedestrian phases of the traffic lights along Pittwater Road in the vicinity of the commercial zone.

3.5.5 Speed Zones

All roads within the study area are 50 km/h zones due to not being signposted and being a built-up area with the exception of Pittwater Road and Ryde Road which are signposted 60km/h.

40km/h school zones are in operation from 8:00am to 9:30am and from 2:30 to 4:00pm on Pittwater Road and Earl Street in the vicinity of Boronia Park Public School to help protect children on their way to and from schools.

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Table 3: Design and construction of existing LATM devices

	Roundabouts are newer and more acceptable than other devices. However, visibility and no splitter islands (paint only) are a recurring issue.
	Pedestrian crossing in Earl Street has poor delineation on approaches and less vertical deflection than required.
	Most road humps have poor delineation on approaches and less vertical deflection than required to be effective.
	Horizontal deflection devices are practically a waste due to being so far below standard.

3.6 Origin/Destination Surveys

Origin/Destination surveys were conducted at 16 gates within the Precinct to identify patterns considered to be "rat runs" where local roads are being used as a faster alternative to the classified road network due to intersection or mid-block congestion.

Excluding Pittwater Road and Ryde Road, an analysis of the through traffic proportions demonstrated that the three most used routes as alternatives were Blaxland Street, Farnell Street and Park Road as shown in Figure 11 and Figure 12.

These results clearly identify rat-running with High Street as the common element. This behaviour is more likely to be regular commuters as they are travelling completely through the study area.

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AM **PM**

Figure 11: Top 3 Rat Runs (North to South)

AM **PM**

Figure 12: Top 3 Rat Runs (South to North)

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3.7 Traffic Speeds

Speed surveys were conducted 24 hours a day for 7 days to identify speed problems and potential safety issues and to provide information about free speeds for use in speed-based design. The results shown in Figure 13 to Figure 15 demonstrate that the 85th percentile speeds are below the 50 km/h speed limit on local roads, with the exception of Farnell Street and Park Road. This result corroborates the rat running issue identified by the OD data.

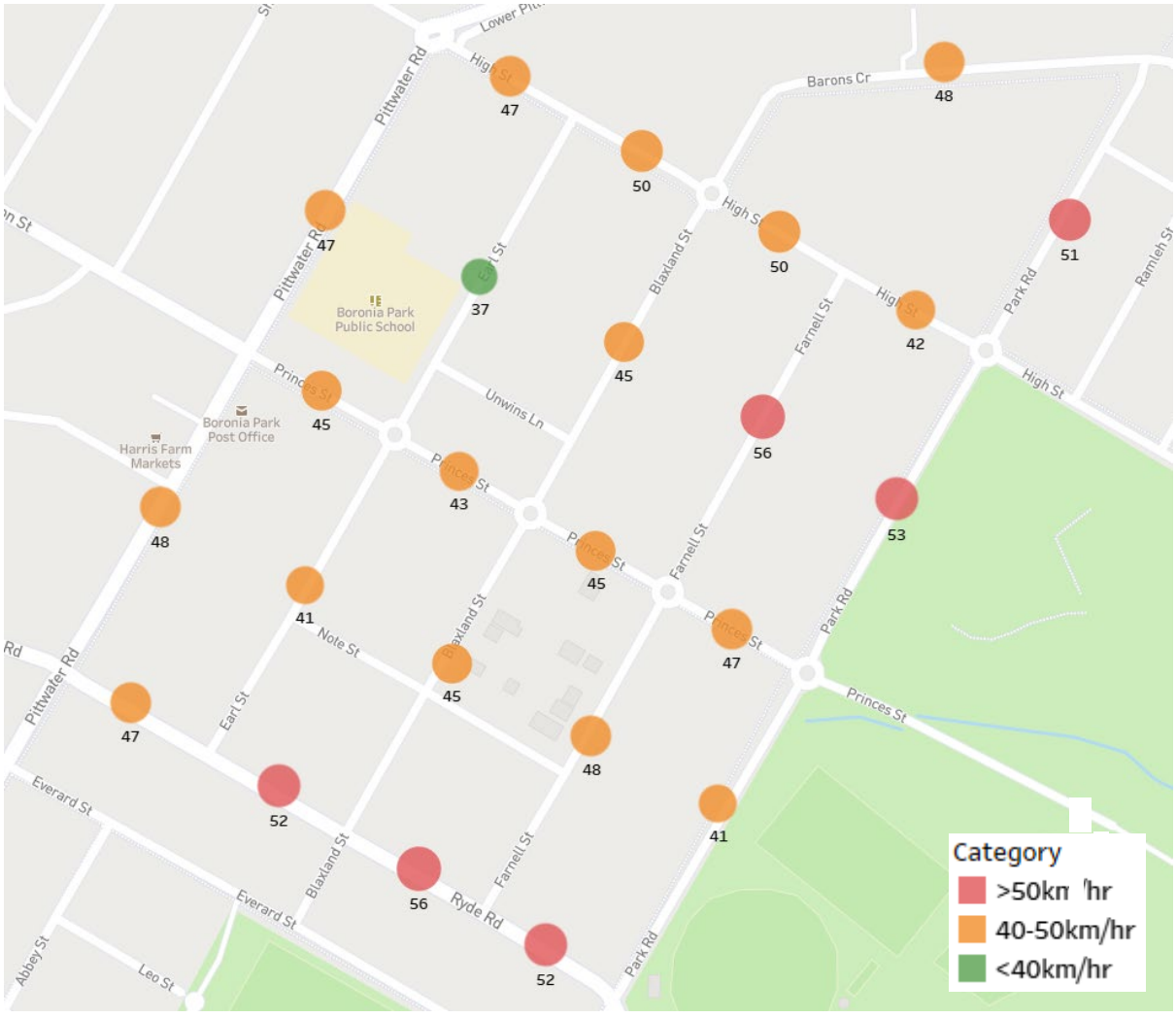

Figure 13: 85th Percentile Speed – Weekday Morning Peak

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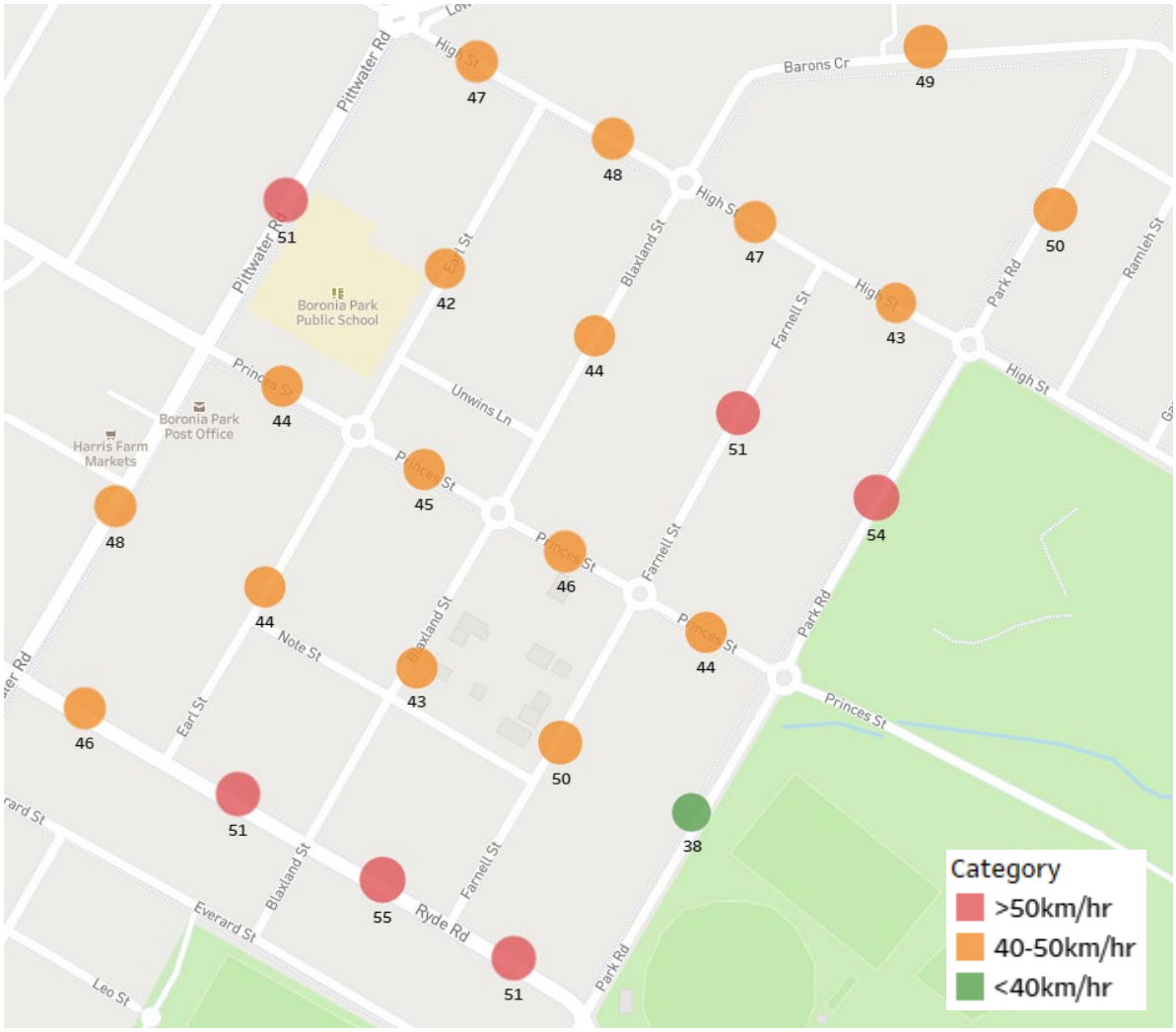

Figure 14: 85th Percentile Speed – Weekday Evening Peak

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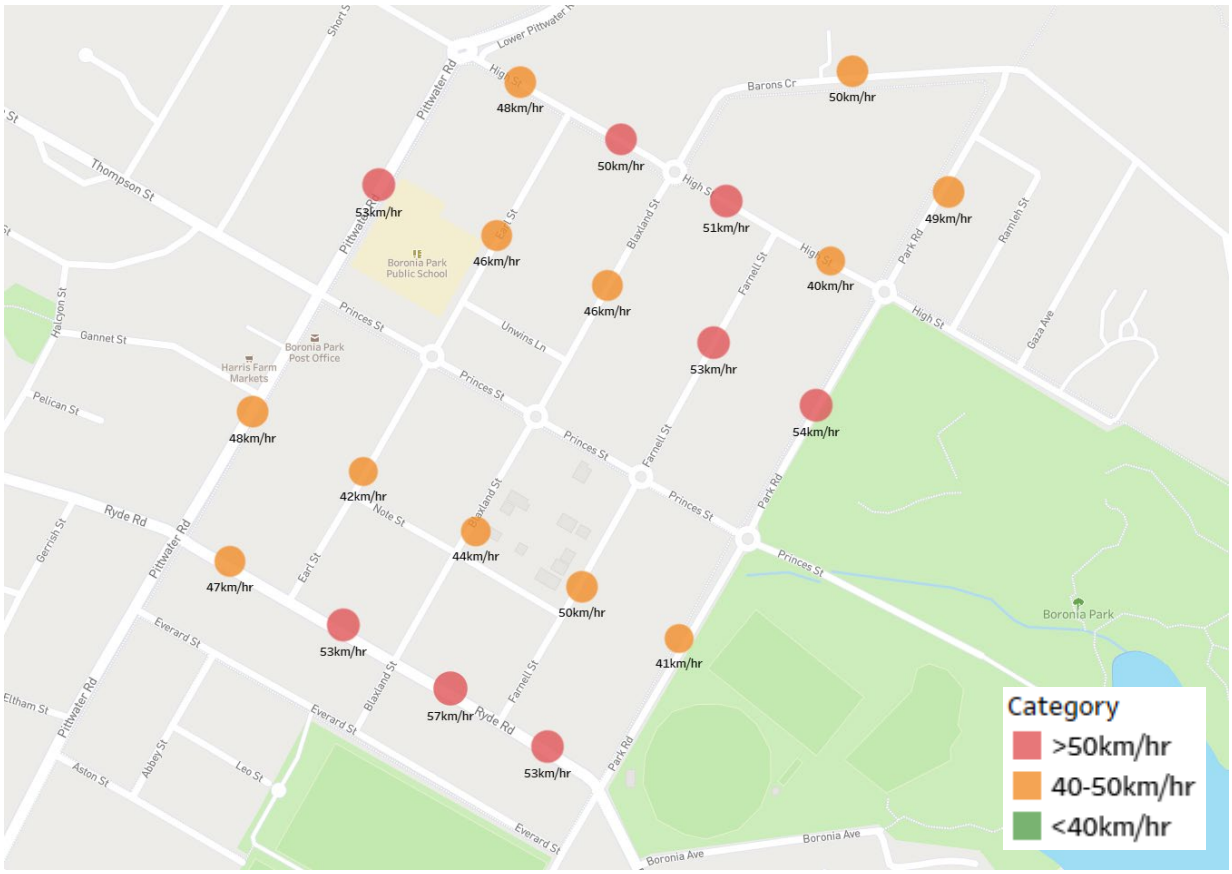

Figure 15: 85th Percentile Speed – Saturday Peak

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3.8 Community survey

Council carried consultation via Social Pinpoint on their website for 3 weeks (26 April – 17 May). Links were included on social media and in newsletters, websites and QR codes on signs around Boronia Precinct. A snapshot of the responses from the website in Figure 16 demonstrates an excellent response.

Figure 16: Social Pinpoint community survey

Council asked residents to provide feedback on issues in the study area via an online, interactive map and the responses have been collated, analysed and assessed as a major component of this study.

Respondents were given the opportunity to enter their own comments and/or like/dislike other comments. This caused an element of ambiguity when assessing certain comments where it was difficult to determine if a 'dislike' agreed or disagreed with a negative comment.

Notwithstanding, the response to the survey was significant with 275 comments received and 3,242 likes or dislikes clicked. These responses were broken down into key areas as shown in Table 4. Clearly, Traffic Management, Road Safety and Speeding are the three most import issues for locals, aligning with the rat-running, safety and speed issues identified from the other data collected.

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Table 4: Cummunity survey response categories

Category	Likes	Dislikes
Amenity	150	27
Maintenance	207	24
Parking	254	98
Road Safety	651	244
Speeding	365	110
Traffic Management	838	267
Total	**2,467**	**775**

Table 5: Cummunity survey response categories

Location	Likes	Dislikes
Amenity	**150**	**27**
Pittwater Road	7	1
Princes Street	9	2
Multiple/Not specified	134	24
Maintenance	**207**	**24**
Multiple/Not specified	207	24
Parking	**254**	**98**
Park Road	13	10
Princes Street	13	4
Multiple/Not specified	228	84
Road Safety	**651**	**244**
Pittwater Road	38	26
Thompson Street	1	2
Speeding	**365**	**110**
Barons Crescent	8	4
Blaxland Street	21	15
Farnell Street	99	16
High Street	17	0
Park Road	38	21
Pittwater Road	106	30
Ryde Road	76	24
Traffic Management	**838**	**267**
Blaxland Street	11	12
Farnell Street	17	20
High Street	114	36
Park Road	18	3
Pittwater Road	17	1
Westminster Road	4	8
Multiple/Not specified	657	183
Total	**2,467**	**775**

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4 Problem Identification

The issues to be resolved through this study have arisen in the following ways:

- Objective assessment of street conditions compared with standards, acceptable thresholds or comparative conditions elsewhere in the locality.
- Complaints and suggestions from members of the community.

It is recommended that further subjective identification of problems be incorporated as part of a thorough and robust assessment, including:

- Definition and confirmation of objectives as part of area improvement and maintenance programs by Council.
- Anticipation of changed conditions resulting from new development, or planned land use or activity changes.

It is clear that complaints and technical deficiencies focus on the same sorts of issues:

- excess traffic
- traffic-related intrusion
- through traffic
- traffic composition
- the amenity of the street
- recorded traffic crashes

Other things that residents have reported, but which are less likely to emerge from routine technical assessments, include:

- crashes: unreported crashes and near misses, concern about routes to school, and traffic security in general in the neighbourhood
- the quality of the cycling and walking environment
- problem vehicles, especially speeding and noisy ones
- Local amenity

Both objective and subjective identification of problems has and will play a part in the public debate that will lead to the clarification of the LATM project objectives. Through this process, demands for street work that has no genuine foundation (objective or subjective) has been filtered out.

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5 Proposed LATM Measures and Recommendations

A number of proposed LATM measures have been recommended by **ptc.** to address the main traffic issues identified from the traffic and community consultation data, in consultation with Council officers.

5.1 Key Issues

The following 'key issues' were identified to guide the formulation of appropriate recommendations:

1) Rat running on High Street, Blaxland Street, Farnell Street, Park Road.
2) Traffic congestion on Pittwater Road and Ryde Road
3) Traffic speeds and irresponsible driving on High Street, Blaxland Street, Farnell Street, Park Road.
4) Pedestrian safety in Pittwater Road, High Street, Blaxland Street, Farnell Street, Park Road.
5) Improved pedestrian facilities on Pittwater Road and Earl Street.
6) Parking on Park Road and Pittwater Road.

5.2 Clarifying Strategies

The first step of a LATM scheme design is the selection of the strategies or general approaches that are appropriate to the objectives being sought. Among the alternative strategies, it may be appropriate to consider alternatives to LATM.

LATM is not always the best or feasible option. The focus should be on outcomes at this stage, not on specific types of measures. A combination of strategies is required to meet the objectives. As part of the strategy selection stage of the process, it should be confirmed that there are not alternatives to LATM that could be considered first. These alternatives may include:

- Regional Road improvements along Pittwater Road and Ryde Road. These roads carry relatively larger amounts of traffic around and to/from the Precinct. TfNSW may consider measures to improve flows, reduce intersection delays and facilitate turns on the as a complement to, if not a sufficient alternative to LATM.
- Land use and community design. Re-zoning to reduce the intrusion of non-resident traffic may be appropriate. Improved streetscaping, provision of play areas and careful location of more intense residential development to reduce its traffic impacts may also be considered. It should be noted that these—apart from changes to the streetscape—tend to be more gradual and longer-term measures.
- Vehicle trip reduction. A form of travel demand management, local trip reduction programs may be considered. Their success in reducing local street traffic problems will be dependent on their effectiveness in significantly reducing the number of vehicle trips generated in the local area. Changes in household composition and the ageing of the population in some areas may have a possible spontaneous influence on traffic generation. This effect has not been adequately researched and and is not directly under Council's ability to influence.
- Non-physical speed management. Proposals that include lower speed limits and more intense enforcement, speed cameras, electronic speed detection, education and attitudinal change programs. Some of these ideas are already known to be at best only marginally effective, while with others there is so far inadequate development, experience, or research to be able to recommend their adoption.

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6 LATM Actions Plan

6.1 Action Plan Development

The proposed LATM measures consider a range of traffic management treatments intended to consider the objectives and combined inputs.

The table below outlines the required interventions and actions within the Precinct. Locations have been broken down into sections of road that can easily be staged for construction purposes.

Priorities have been defined as:

- High: Requires immediate attention due to safety risks
- Medium: Necessary to manage traffic management issues and safety
- Low: Supplementary measures to enhance other priorities

Categories have been grouped into:

- Road Safety: S
- Reconstruction: R
- New LATM Devices: L

Table 6: LATM Action Plan

Item	Location	Action	Priority
S1	Ryde Road, Pittwater Road to Park Road	Road Safety Audit	High
S2	Pittwater Road, High Street to Ryde Road	Road Safety Audit	High
R1	Earl Street, Ryde Road to Princes Street	Reconstruct 3 road humps to Austroads standards	Medium
R2	Blaxland Street, Ryde Road to Princes Street	Reconstruct 3 road humps to Austroads standards	Medium
R3	Farnell Street, Ryde Road to Princes Street	Reconstruct 3 road hump to Austroads standards	Medium
R4	Park Road, Ryde Road to Princes Street	Reconstruct 3 road hump to Austroads standards	Medium
R5	Earl Street, High Street to Princes Street	• Reconstruct slow point to Austroads standards. • Reconstruct zebra crossing to Austroads standards	High
R6	Blaxland Street, High Street to Princes Street	Reconstruct slow point to Austroads standards.	High
R7	Farnell Street, High Street to Princes Street	Reconstruct slow point to Austroads standards.	High
L1	Park Road, High Street to Princes Street	Reconstruct 2 slow points to Austroads standards	High
L2	High Street, Pittwater Road to Blaxland Street	Construct 2 new road hump to Austroads standards	High
L3	High Street, Blaxland Street to Park Road	Construct 2 new road hump to Austroads standards	High
L4	Barons Crescent, High Street to Park Road	Construct new road hump to Austroads standards	Low
L5	Park Road, High Street to Barons Crescent	Construct new slow point to Austroads standards	Low

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7 Next Steps

7.1 Scheme Design

Once the draft scheme is approved, more detailed cost estimates can be prepared, priorities refined, and the timing and staging can be confirmed.

Detailed design and documentation for treatments can then be undertaken in order to:

- carry out further street assessments if necessary (kerb and property lines, driveway locations, location of above-ground and below-ground services, drainage channels and pits, tree locations and assessments, pavement surface details, etc.
- prepare detailed drawings
- prepare construction and contract documentation
- maintain close consultation with residents adjacent to device locations, services companies, and (if concerns have previously been raised) bus companies and relevant emergency services.
- develop a maintenance strategy
- pursue funding if external funding opportunities exist.

Detailed design covers two stages:

- layout design, to determine the form of the device
- engineering design, as part of construction documentation.

7.2 Implementation

7.2.1 Timing and Staging

Work may be staged, or implemented in full at one time. Staging is usually undertaken for practical or funding reasons, but it may also be used as a form of trial or familiarisation. In particular, there may be uncertainty about the traffic displacement effects of a set of treatments, so the scheme may be implemented gradually and the changes monitored at each stage.

7.2.2 Monitoring and Review

Monitoring and evaluation of the final scheme and any intermediate stages is an essential part of the planning process. It is often overlooked or neglected because of time and resource pressures. The purposes and value of monitoring and evaluation include:

- assessing the scheme as a whole and individual treatments against the adopted objectives
- to identify any undesirable impacts that might indicate modifications that could be made
- to assess the impacts of each stage so that subsequent stages can be modified if necessary
- to provide objective information on impacts and effects for the community
- to provide information on the performance of the scheme and individual devices which may be useful in later projects.

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Appendix A Proposed LATM Actions

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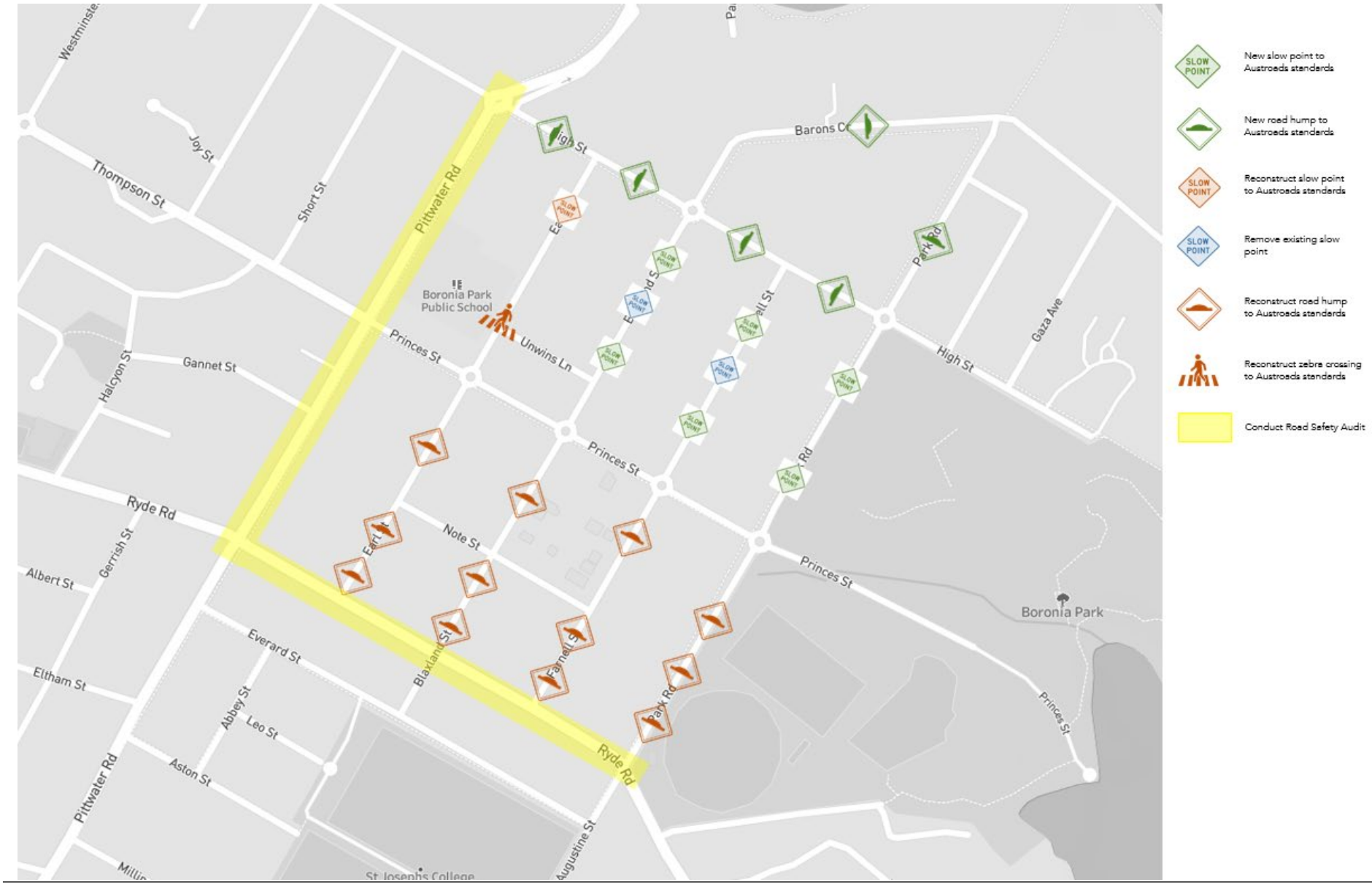

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Submission Type

I am making a personal submission

Title

Mr

First Name

Richard

Family name

Willcock

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Suburb/ Town

Hunters Hill

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submission

This is the second of 2 attachments to my Submission dated 12 January, 2026.

Technical Direction

For traffic, safety and transport practitioners

OPERATIONAL POLICY – GUIDELINES – ADVICE

Transport Roads & Maritime Services

Published August 2013

Supersedes/Amends TDT 2013/04

TDT 2013/ 04a

Guide to Traffic Generating Developments

Updated traffic surveys

Introduction

The *Guide to Traffic Generating Developments* was first released in 1991. It was revised in 2001 and is in the process of being further revised. It provides guidance on a number of matters related to the traffic impacts of land use developments, most notably on matters relating to traffic generation and parking. Its audience extends beyond that of traffic authorities (RMS and Councils) and is widely used throughout Australia.

Over the past few years a number of surveys have been undertaken to update trip generation and parking information as part of the *Guide*. This Technical Direction provides a summary of the updated information. The information herein should be used to supplement the current Guide and replace those sections of the *Guide* indicated. The information is provided in two parts; (i) a very brief summary below and (ii) more extended summaries in Appendices A-H. More detailed information may be obtained by referral to the RMS Library where reports on each land use may be found.

Summaries of land use traffic generation

Low density residential dwellings

Eleven surveys were conducted in 2010, six within the Sydney urban area and five within regional NSW. The results of the surveys were as follows:

Rates
Daily vehicle trips = 10.7 per dwelling in Sydney, 7.4 per dwelling in regional areas Weekday average evening peak hour vehicle trips = 0.99 per dwelling in Sydney (maximum 1.39), 0.78 per dwelling in regional areas (maximum 0.90). Weekday average morning peak hour vehicle trips = 0.95 per dwelling in Sydney (maximum 1.32), 0.71 per dwelling in regional areas (maximum 0.85). (The above rates do **not** include trips made internal to the subdivision, which may add up to an additional 25%).

Distribution List:

Director, Infrastructure Development; RMS Development Managers; RMS Land use/Planning Officers; Councils; Land & Environment Court Officers and Consultants.

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Amendment: Required Action (Pg 3) amended.
Approved: R O'Keefe, Mgr Traffic Policy, Guidelines & Legislation
RMS. 13.298

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High density residential flat dwellings

Ten surveys were conducted in 2012, eight within Sydney, and one each in the Hunter and Illawarra. All developments were (i) close to public transport, (ii) greater than six storeys and (iii) almost exclusively residential in nature. The weekday trip generation rates were as follows:

Weekday Rates	Sydney Average	Sydney Range	Regional Average	Regional Range
AM peak (1 hour) vehicle trips per unit	0.19	0.07-0.32	0.53	0.39-0.67
AM peak (1 hour) vehicle trips per car space	0.15	0.09-0.29	0.35	0.32-0.37
AM peak (1 hour) vehicle trips per bedroom	0.09	0.03-0.13	0.21	0.20-0.22
PM peak (1 hour) vehicle trips per unit	0.15	0.06-0.41	0.32	0.22-0.42
PM peak (1hour) vehicle trips per car space	0.12	0.05-0.28	0.26	0.11-0.40
PM peak (1 hour) vehicle trips per bedroom	0.07	0.03-0.17	0.15	0.07-0.22
Daily vehicle trips per unit	1.52	0.77-3.14	4.58	4.37-4.78
Daily vehicle trips per car space	1.34	0.56-2.16	3.22	2.26-4.18
Daily vehicle trips per bedroom	0.72	0.35-1.29	1.93	1.59-2.26

Housing for seniors

Ten surveys were conducted in 2009, five within the Sydney urban area and five in regional New South Wales. Summary trip generation rates were as follows:

Weekday daily vehicle trips = 2.1 per dwelling
Weekday peak hour vehicle trips = 0.4 per dwelling
(Note that morning site peak hour does not generally coincide with the network peak hour)

Office blocks

Ten surveys were conducted in 2010. Eight of the surveys were conducted within the Sydney urban area and one each in Newcastle and Wollongong. The Sydney sites provided a range of locations with two inner ring sites, four middle ring sites and two outer ring sites. Most had access to the rail network. Summary trip generation rates were as follows:

Daily vehicle trips = 11 per 100 m^2 gross floor area
Morning peak hour vehicle trips = 1.6 per 100 m^2 gross floor area.
Evening peak hour vehicle trips = 1.2 per 100 m^2 gross floor area.

Business parks and industrial estates

In 2012 eleven of these two types of sites were surveyed, four within the Sydney urban area, four within the Lower Hunter, one in the Illawarra and one in Dubbo. Summary vehicle trip generation rates were as follows:

Weekday Rates	Sydney Average	Sydney Range	Regional Average	Regional Range
AM peak (1 hour) vehicle trips per 100 m^2 of GFA.	0.52	0.15-1.31	0.70	0.32-1.20
PM peak (1 hour) vehicle trips per 100 m^2 of GFA.	0.56	0.16-1.50	0.78	0.39-1.30
Daily total vehicle trips	4.60	1.89-10.47	7.83	3.78-11.99

SUPERSEDED

Shopping Centres

Extensive surveys of shopping centres were conducted in 1978, 1990 and again in 2011. The latter survey involved ten larger shopping centres, seven in the Sydney metropolitan area and one each at Mittagong, Shellharbour and Tuggerah. Peak hour trip generation rates are as follows:

Range in Total Floor Area (GLFA – m^2)	Peak Hour Generation Rate (vehicles per 100m^2 GLFA)			
	Thursday (V(P)/A)	Friday (V(P)/A)	Saturday PVT (A)	Sunday
0 – 10,000	12.3	12.5	16.3	
10,000 – 20,000	7.6 (6.2)	6.2 (6.7)	7.5 (7.5)	(6.6)
20,000 – 30,000	5.9 (6.0)	5.6 (5.9)	7.5 (7.0)	(6.3)
30,000 – 40,000	4.6	3.7	6.1	
40,000 – 70,000	(4.4)	(4.4)	(5.5)	(4.6)
70,000+	(3.1)	(4.0)	(3.6)	(3.2)

* Figures in brackets refer to 2011 surveys. Other figures are as per 1978 and 1990 surveys. Caution should be used in comparing the data in that they reflect changes in shopping behaviours. Seasonally adjusted rates appear to be in the order of 3-5% higher than the quoted 2011 rates.

Bulky goods retail stores

Six surveys were conducted in 2009. Two of the surveys were conducted within the Sydney urban area (one electrical goods and one furniture) and four within regional New South Wales (two electrical goods and two furniture). Summary vehicle trip rates are as follows:

Weekday daily vehicle trips = 17 (including 1 heavy) vehicles per 100 m^2 of gross floor area)
Weekday peak hour vehicle trips = 2.7 vehicles per 100 m^2 of gross floor area. (note that the morning site peak hour during weekdays does not generally coincide with the network peak hour.)
Weekend day daily vehicle trips = 19 vehicles per 100 m^2 of gross floor area (minimal heavy vehicles)
Weekend day peak hour vehicle trips = 3.9 vehicles per 100 m^2 of gross floor area.

Major hardware and building supplies stores

Nine surveys were conducted in 2009. Five of the surveys were conducted within the Sydney urban area and four within regional New South Wales. Summary vehicle trip rates are as follows:

Weekday daily vehicle trips = 33 vehicles per 100 m^2 of gross floor area (includes 2 heavy vehicles)
Weekday peak hour vehicle trips = 4.2 vehicles per 100 m^2 of gross floor area. (Note that higher trip rates are observed in the PM network peak with commensurately higher traffic impacts at that time.)
Weekend day daily vehicle trips = 35 vehicles per 100 m^2 of gross floor area (minimal heavy vehicles)
Weekend day peak hour vehicle trips = 5.6 vehicles per 100 m^2 of gross floor area.

Action

This *Technical Direction* must be followed when RMS is undertaking trip generation and/or parking demand assessments.

SUPERSEDED

Updates

To ensure that this *Technical Direction* and any related guidelines remain current and relevant, minor updates may be made from time to time. Any updates may be obtained from the RMS website using the Traffic & Transport Policies & Guidelines Register which can be found at:

www.rta.nsw.gov.au/doingbusinesswithus/guidelines/documentregister/index.html

Printed copies of this *Technical Direction* are uncontrolled, therefore the Register should always be checked prior to using this *Technical Direction* or any related guidelines.

Approved by:

SIGNED

Craig Moran
General Manager
Traffic & Safety Management

Authorised by:

SIGNED

Jim Peachman
A/Director
Journey Management

SUPERSEDED

APPENDIX A - LOW DENSITY RESIDENTIAL – SURVEY DETAILS

Source: Trip Generation Surveys, Low Density Residential, TEF Consulting, in association with Gennaoui Consulting Pty Ltd, for the NSW Roads and Traffic Authority, June 2010, p6

	Survey area ID										
	LDR1	LDR2	LDR3	LDR4	LDR5	LDR6	LDR7	LDR8	LDR9	LDR10	LDR11
Area Characteristics:											
Suburb	Beaumont Hills	Longueville	North Epping	Werrington Downs	West Hoxton	Westleigh	Coffs Harbour	Goonellabah	Calare	Glenfield Park	Farmborough Heights
Local Government Area	Baulkham Hills	Lane Cove	Hornsby	Penrith	Liverpool	Hornsby	Coffs Harbour	Lismore	Orange	Wagga Wagga	Wollongong
Typical housing type	two-storey	two-storey	one - & two-storey	one-storey	large two-storey	one-storey	one-storey	one - & two-storey	one-storey	one-storey	one - & two-storey
Indicative Public Transport Accessibility Score	6	30	11	8	5	6	3	2	2	3	2
Traffic generating developments within the area	1 School, 2 Childcare centres	1 Private Hospital	1 School, 2 Childcare centres, 1 Shopping Village, 1 Local shop, 1 Retirement Village	1 Childcare centre	1 School, 3 Childcares, 1 Medical Centre	1 School, 1 Childcare, 1 Shopping centre	None	1 Function Centre	2 Childcare centres, 1 Aged Care facility	None	None
No. of dwellings	956	676	1495	669	1235	1335	509	556	697	554	905
Population	3,346	2,084	4,295	2,095	4,552	4,024	1,250	1,378	2,037	1,391	2,685
	4	3	3	3	4	3	2	2	3	3	3
Date of survey	04-May-10	28-Apr-10	28-Apr-10	04-May-10	06-May-10	28-Apr-10	13-May-10	12-May-10	06-May-10	05-May-10	06-May-10
Day of survey	Tuesday	Wednesday	Wednesday	Tuesday	Thursday	Wednesday	Thursday	Wednesday	Thursday	Wednesday	Thursday
Duration of survey	06:00-19:00 (13 hours) - All survey areas										
Weather	Fine	Fine	Fine	Fine	Fine	Fine	Fine	Fine	Fine	Overcast, light morning showers	Fine
Surrounding roads- AM peak period	08:00-09:00	08:00-09:00	06:00-07:00	08:00-09:00	08:00-09:00	07:00-08:00	08:00-09:00	08:00-09:00	08:00-09:00	08:00-09:00	08:00-09:00
Surrounding roads - PM peak period	17:00-18:00	17:00-18:00	15:00-16:00	15:30-16:30	17:00-18:00	16:00-17:00	15:00-16:00	17:00-18:00	16:00-17:00	16:00-17:00	15:00-16:00
Person Trips:											
o Peak 1-hour person-trips	2170	1083	1390	1286	2807	1207	735	631	1018	733	892
o Time of peak 1-hour person-trips	15:00-16:00	07:15-08:15	07:30-08:30	16:30-17:30	08:00-09:00	17:00-18:00	15:15-16:15	15:30-16:30	08:00-09:00	15:30-16:30	07:45-08:45
o Peak person-trips per dwelling	2.27	1.60	0.93	1.92	2.27	0.90	1.44	1.13	1.46	1.32	0.99
o Peak person-trips per resident	0.65	0.52	0.32	0.61	0.62	0.30	0.59	0.46	0.50	0.53	0.33
o Total daily person-trips	14389	9699	11276	9753	17668	11489	4955	5099	7356	4878	6672
o Total daily person-trips per dwelling	15.05	14.35	7.54	14.58	14.31	8.61	9.73	9.17	10.55	8.81	7.37
o Total daily person-trips per resident	4.30	4.65	2.63	4.65	3.88	2.86	3.96	3.70	3.61	3.51	2.49
o Person-trips in network AM peak	1880	917	401	1046	2807	1042	639	629	1018	569	851
o Person-trips in network PM peak	1517	939	1169	1068	1732	1085	675	557	896	655	854
Vehicle Trips:											
o Peak 1-hour vehicle-trips	1170	710	875	932	1625	944	384	446	627	480	555
o Time of peak 1-hour vehicle-trips	08:00-09:00	17:30-18:30	07:30-08:30	17:00-18:00	08:00-09:00	17:00-18:00	08:00-09:00	17:00-18:00	16:45-17:45	17:15-18:15	07:45-08:45
o Peak vehicle-trips per dwelling	1.22	1.05	0.59	1.39	1.32	0.71	0.75	0.80	0.90	0.87	0.61
o Peak vehicle-trips per resident	0.35	0.34	0.20	0.44	0.36	0.23	0.31	0.32	0.31	0.35	0.21
o Total daily vehicle-trips	9237	6962	7816	6914	11983	8888	3325	3635	4962	3521	4670
o Total daily vehicle-trips per dwelling	9.66	10.30	5.23	10.33	9.70	6.66	6.53	6.54	7.12	6.36	5.16
o Total daily vehicle-trips per resident	2.76	3.34	1.82	3.30	2.63	2.21	2.66	2.64	2.44	2.53	1.74
o Vehicle-trips in network AM peak	1170	598	297	649	1625	790	384	368	591	372	543
o Vehicle-trips in network PM peak	1070	709	653	744	1271	808	334	446	552	460	485
o Car Occupancy (average over survey period)	1.25	1.24	1.30	1.28	1.38	1.21	1.35	1.28	1.42	1.32	1.33
% of total trips by mode:											
o % Car (as driver)	61.2%	68.7%	67.7%	68.6%	65.3%	75.2%	65.6%	68.2%	66.7%	70.2%	67.1%
o % Car (as passenger)	15.2%	16.8%	20.5%	18.9%	25.0%	16.1%	23.2%	19.0%	27.9%	22.1%	21.9%
o % Train	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%
o % Bus	16.9%	4.5%	5.2%	5.6%	4.0%	3.5%	4.3%	7.0%	2.9%	5.9%	6.2%
o % Cycle	0.3%	0.4%	0.7%	0.7%	0.2%	0.3%	1.3%	0.5%	0.3%	0.1%	0.3%
o % On foot	5.4%	6.8%	4.3%	4.9%	3.5%	3.0%	4.4%	3.6%	1.8%	1.0%	2.6%
o % Other	1.0%	2.9%	1.6%	1.3%	2.0%	1.8%	1.3%	1.7%	0.4%	0.6%	1.8%

SUPERSEDED

APPENDIX B1 – HIGH DENSITY RESIDENTIAL – WEEKDAYS

	Sydney Metropolitan Area					Regional Area				
Site No.	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7	Site 10	Site 8	Site 9
Location	St Leonards	Chatswood	Cronulla	Rockdale	Parramatta	Liberty Grove	Strathfield	Pyrmont	Charlestown	Wollongong
Total Units	70	129	28	234	83	64	31	131	108	9
1 Bed	15	8	0	4	9	0	0	70	31	0
2 Bed	24	96	14	214	57	36	31	54	53	0
3+ Bed	31	25	14	16	17	28	0	7	24	9
Parking Spaces	97	206	18	260	108	93	30	199	113	19
Parking Ratio	1.39	1.60	0.64	1.11	1.30	1.45	0.97	1.52	1.05	2.11
Person Based Trips										
Daily Person Based Trips*										
- Car Based	65	245	27	720	177	284	40	160	527	53
- Other	179	445	56	535	239	132	89	240	124	25
- Total	244	690	83	1255	416	416	129	400	651	78
Average Person Trips Per hour*	19	53	6	97	32	32	10	31	50	6
Peak Person Trips	47	129	18	194	104	73	28	91	79	14
Peak Vehicle-Hour Person Trips	47	129	16	194	104	66	28	91	86	10
Peak Network Hour Person Trips										
- AM Peak	45	83	9	189	79	46	16	91	57	8
- PM Peak	38	106	4	123	54	58	13	60	70	10
% Mode Split										
Car Driver	22%	23%	31%	42%	33%	48%	28%	34%	73%	55%
Car Passenger	5%	12%	1%	15%	9%	20%	3%	6%	8%	13%
Non-Car	73%	64%	67%	43%	57%	32%	69%	60%	19%	32%
Vehicle-Based Trips										
Daily Vehicle Trips*	54	159	26	527	139	201	36	135	472	43
Peak Vehicle Trips	13	25	7	76	22	38	5	23	67	8
Peak Network Hour Vehicle Trips										
- AM Peak	10	18	2	76	22	18	3	23	42	6
- PM Peak	5	15	3	43	10	26	2	13	45	2
- % Car Parking Occupancy	62%	62%	-*	75%	77%	73%	73%	50%	78%	74%
Average Vehicle Occupancy										
- AM Peak	1.5	1.4	1.0	1.3	1.3	1.1	1.0	1.1	1.0	1.2
- PM Peak	1.4	1.6	1.0	1.4	1.5	1.4	1.0	1.1	1.2	1.0
- Average Over the Day*	1.2	1.5	1.0	1.4	1.3	1.4	1.1	1.2	1.1	1.2

SUPERSEDED

APPENDIX B2 – HIGH DENSITY RESIDENTIAL - SATURDAYS

	Sydney Metropolitan Area								Regional Area	
Site No.	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7	Site 10	Site 8	Site 9
Location	St Leonards	Chatswood	Cronulla	Rockdale	Parramatta	Liberty Grove	Strathfield	Pyrmont	Charlestown	Wollongong
Total Units	70	129	28	234	83	64	31	131	108	9
1 Beds	15	8	0	4	9	0	0	70	31	0
2 Beds	24	96	14	214	57	36	31	54	53	0
3+ Bed	31	25	14	16	17	28	0	7	24	9
Parking Spaces	97	206	18	260	108	93	30	199	113	19
Person Based Trips										
Daily Person Based Trips*										
- Car Based	220	288	26	589	181	252	75	217	304	55
- Other	494	501	90	683	306	175	158	420	205	40
- Total	714	789	116	1272	487	427	233	637	509	95
Average Person Trips*	55	61	9	98	37	33	18	49	39	7
Peak Person Trips	217	132	23	181	70	64	31	104	66	17
Peak Vehicle-Hour Person Trips	106	92	23	154	70	59	27	63	63	16
Peak Network Hour Person Trips	44	92	15	154	34	50	26	93	55	8
% Mode Split										
Car Driver	18%	23%	15%	31%	24%	30%	22%	23%	50%	35%
Car Passenger	12%	13%	8%	15%	14%	29%	10%	11%	10%	23%
Other	69%	63%	78%	54%	63%	41%	68%	66%	40%	42%
Vehicle-Based Trips										
Daily Vehicle Trips*	132	182	17	394	115	129	51	145	252	33
Peak Vehicle Trips	22	27	5	54	18	20	10	25	42	7
Peak Network Hour Vehicle Trips	17	21	3	54	9	14	6	21	35	2
Peak Parking Accumulation										
- % Car Parking Occupancy	56%	58%	-*	77%	68%	69%	63%	44%	65%	79%
Average Vehicle Occupancy										
- Peak Hour	1.5	1.6	1.7	1.3	1.9	2.0	1.8	1.4	1.1	2.0
- Average Over the Day*	1.7	1.6	1.5	1.5	1.6	2.0	1.5	1.5	1.2	1.7

**Parking accumulation for the Cronulla site could not be determined accurately as some car spaces were enclosed*

SUPERSEDED

APPENDIX B3 – HIGH DENSITY RESIDENTIAL – GENERATION RATES

	Sydney Metropolitan Area								Regional Area	
Site No.	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	Site 7	Site 10	Site 8	Site 9
Location	St Leonards	Chatswood	Cronulla	Rockdale	Parramatta	Liberty Grove	Strathfield	Pyrmont	Charlestown	Wollongong
Weekday										
AM Peak Person Trips per Unit	0.64	0.64	0.32	0.81	0.95	0.72	0.52	0.69	0.53	0.89
AM Peak Person Trips per Car Space	0.39	0.51	0.22	0.47	0.50	0.62	0.43	0.30	0.62	0.53
AM Peak Person Trips per Bedroom	0.29	0.30	0.13	0.39	0.45	0.29	0.26	0.46	0.27	0.30
PM Peak Person Trips per Unit	0.54	0.82	0.14	0.53	0.65	0.91	0.42	0.46	0.65	1.11
PM Peak Person Trips per Car Space	0.54	0.82	0.14	0.53	0.65	0.91	0.42	0.46	0.65	1.11
PM Peak Person Trips per Bedroom	0.24	0.39	0.06	0.26	0.31	0.37	0.21	0.30	0.33	0.37
Daily Person Trips per Unit	3.49	5.35	2.96	5.36	5.01	6.50	4.16	3.05	6.03	8.67
Daily Person Trips per Car Space	2.52	3.35	4.61	4.83	3.85	4.47	4.30	2.01	5.76	4.11
Daily Person Trips per Bedroom	1.56	2.51	1.19	2.61	2.39	2.67	2.08	2.01	3.11	2.89
AM Peak Vehicle Trips per Unit	0.14	0.14	0.07	0.32	0.27	0.28	0.10	0.18	0.39	0.67
AM Peak Vehicle Trips per Car Space	0.10	0.09	0.11	0.29	0.20	0.19	0.10	0.12	0.37	0.32
AM Peak Vehicle Trips per Bedroom	0.06	0.07	0.03	0.16	0.13	0.12	0.05	0.12	0.20	0.22
PM Peak Vehicle Trips per Unit	0.07	0.12	0.11	0.18	0.12	0.41	0.06	0.10	0.42	0.22
PM Peak Vehicle Trips per Car Space	0.05	0.07	0.17	0.17	0.09	0.28	0.07	0.07	0.40	0.11
PM Peak Vehicle Trips per Bedroom	0.03	0.05	0.04	0.09	0.06	0.17	0.03	0.07	0.22	0.07
Daily Vehicle Trips per Unit	0.77	1.23	0.93	2.25	1.67	3.14	1.16	1.03	4.37	4.78
Daily Vehicle Trips per Car Space	0.56	0.77	1.44	2.03	1.29	2.16	1.20	0.68	4.18	2.26
Daily Vehicle Trips per Bedroom	0.35	0.58	0.37	1.10	0.80	1.29	0.58	0.68	2.26	1.59
Saturday										
Peak Hour Person Trips per Unit	3.10	1.02	0.82	0.77	0.84	1.00	1.00	0.79	0.61	1.89
Peak Hour Person Trips per Car Space	2.24	0.64	1.28	0.70	0.65	0.69	1.03	0.52	0.58	0.89
Peak Hour Person Trips per Bedroom	0.68	0.33	0.33	0.32	0.40	0.38	0.44	0.32	0.30	0.59
Daily Person Trips per Unit	10.20	6.12	4.14	5.44	5.87	6.67	7.52	4.86	4.71	10.56
Daily Person Trips per Car Space	7.36	3.83	6.44	4.89	4.51	4.59	7.77	3.20	4.50	5.00
Daily Person Trips per Bedroom	4.58	2.87	1.66	2.65	2.80	2.74	3.76	3.20	2.44	3.52
Peak Hour Vehicle Trips per Unit	0.31	0.21	0.18	0.23	0.22	0.31	0.32	0.19	0.39	0.78
Peak Hour Vehicle Trips per Car Space	0.23	0.13	0.28	0.21	0.17	0.22	0.33	0.13	0.37	0.37
Peak Hour Vehicle Trips per Bedroom	0.14	0.10	0.07	0.11	0.10	0.13	0.16	0.13	0.20	0.26
Daily Vehicle Trips per Unit	1.89	1.41	0.61	1.68	1.39	2.02	1.65	1.11	2.33	3.67
Daily Vehicle Trips per Car Space	1.36	0.88	0.94	1.52	1.06	1.39	1.70	0.73	2.23	1.74
Daily Vehicle Trips per Bedroom	0.85	0.66	0.24	0.82	0.66	0.83	0.82	0.73	1.21	1.22

SUPERSEDED

APPENDIX C1 – SENIORS LIVING – SITE DETAILS

Site ID	SH1	SH2	SH3	SH4	SH5	SH6	SH7	SH8	SH9	SH10
Suburb	Dee Why 2099	Allambie Heights 2100	North Parramatta 2151	Richmond 2753	Prestons 2170	Bonnells Bay 2264	Wamberal 2260	Kincumber 2251	Tahmoor 2573	Bowral 2576
Network Peak Hours										
Year of Network Survey Dates	2005	2009 21/3-27/3	2005	2009 23/3-29/3	2009 6/4-12/4	2009 21/3-1/4	2004	2009 21/03-25/3	2009 19/3-25/3	2006
AM Peak - Weekdays	0800-0900	0800-0900	0800-0900	0800-0900	0900-1000	0900-1000	0800-0900	1100-1200	0900-1000	0800-0900
PM Peak - Weekdays	1700-1800	1700-1800	1700-1800	1500-1600	1600-1700	1500-1600	1500-1600	1600-1700	1700-1800	1500-1600
Peak - Weekends	1200-1300	1200-1300	1200-1300	1100-1200	1200-1300	1100-1200	1200-1300	1100-1200	1100-1200	1100-1200
Site Details - Senior Housing										
Accommodation Type	S + H	S + H	S + H + A	S + H + A	S + H	S	S	S	S	S + H
Funded (Resident / Government)	Resident	Resident	Resident	Resident	Both	Resident	Resident	Resident	Resident	Resident
Original Unit Cost	200k-250k	200k-480k	180k-220k	Unknown	135k-175k	300k-400k	90k-95k	365k-520k	95K	385k-645k
Year Constructed	1988-2000	1966-2009	1994-2001	1983-2005	1999-2003	1996	1983-1986	2002-2007	1997	1986
Village Bus	Yes	Yes	Yes	Yes	Yes	Yes	No	Yes	No	No
Village Bus Frequency per week	9	2	10	2	4	4	No	3	No	No
No. of Units Provided (Total)	272	83	276	174	214	250	62	76	42	86
No. of Occupied Units (Self)	180	40	116	43	147	240	51	70	38	68
No. of Residents (Self)	226	48	157	43	217	350	51	92	50	100-110
No. of Occupied Units (Low-care)	25	38	50	61	67	N/A	N/A	N/A	N/A	13
No. of Residents (Low-care)	25	39	50	61	67	N/A	N/A	N/A	N/A	
No. of Occupied beds (High-care)	N/A	N/A	98	70	N/A	N/A	N/A	N/A	N/A	N/A
No. of Residents (High-care)	N/A	N/A	98	70	N/A	N/A	N/A	N/A	N/A	N/A
No. of employee (Total)	15	32	160	130	30	8	3	10	1	19
No. of employee (at one time)	N/A	12	45	30-40	<30	8	2	1	1	19
Accessbility Score	<79	<79	<79	<79	<79	0.5	32	32	6.5	8
Parking Spaces										
Residents	110	17	82	26	155	500	62	111	42	80
Staff	as Visitor	16	25	as Visitor	11	4	as Visitor	as Visitor	1	as Vistor
Visitors / Loading bays	32	11	32	52	28	75	11	28	16	10
Total	142	44	139	78	194	579	73	139	59	90
Cars Ownership										
No Car	Unknown		54		83	0	16	4	16	
1 Car	Unknown	17	59	15	83	230	37	39	22	60
2 Cars	Unknown		5		0	10	0	10	0	
No. of Cars (Total)	Unknown	17	69	15	83	250	37	59	22	60

Source: Trip Generation and Parking Generation Surveys, Housing for Seniors, Analysis Report, Hyder for the NSW Roads and Traffic Authority, June 2009, p7

SUPERSEDED

APPENDIX C2 – SENIORS LIVING, TRIPS PER OCCUPIED UNIT - WEEKDAY

	Sydney Metropolitan Area					Non-Metropolitan Area				
Site ID	**SH1**	**SH2**	**SH3**	**SH4**	**SH5**	**SH6**	**SH7**	**SH8**	**SH9**	**SH10**
No. of Occupied Units (Total)	**205**	**78**	**264**	**174**	**214**	**240**	**71**	**70**	**38**	**81**
Weekdays										
Person-based Trips										
- Site Peak Hour	126	31	110	80	91	149	31	39	34	44
Trips/ Unit	0.61	0.40	0.42	0.46	0.43	0.62	0.61	0.56	0.89	0.54
- Vehicle Network AM Peak Trips/ Unit	Network AM peak is outside of survey periods									
- Vehicle Network PM Peak	116	8	23	56	44	86	26	22	1	43
Trips/ Unit	0.57	0.10	0.09	0.32	0.21	0.36	0.51	0.31	0.03	0.53
Daily Total Person Trips	854	163	653	481	528	1,037	182	225	139	269
Trips/ Units	4.17	2.09	2.47	2.76	2.47	4.32	3.57	3.21	3.66	3.32
Vehicle-based Trips										
- Site Peak Hour	87	20	62	55	54	105	20	27	21	37
Trips/ Unit	0.42	0.26	0.23	0.32	0.25	0.44	0.39	0.39	0.55	0.46
- Network AM Peak Trips/ Unit	Network AM peak is outside of survey periods									
- Network PM Peak	74	5	12	41	36	54	16	16	1	27
Trips/ Unit	0.36	0.06	0.05	0.24	0.17	0.23	0.31	0.23	0.03	0.33
Daily Total Car Trips	584	95	351	285	294	685	100	146	63	204
Trips/ Unit	2.85	1.22	1.33	1.64	1.37	2.85	1.96	2.09	1.66	2.52
Daily Total CV Trips	9	10	30	26	38	59	9	6	12	5
Trips/ Unit	0.04	0.13	0.11	0.15	0.18	0.25	0.18	0.09	0.32	0.06
Daily Total Vehicle Trips	593	105	381	311	332	744	109	152	75	209
Trips/ Unit	2.89	1.35	1.44	1.79	1.55	3.10	2.14	2.17	1.97	2.58
% CV	1.5%	9.5%	7.9%	8.4%	11.4%	7.9%	8.3%	3.9%	16.0%	2.4%

* CV – Commercial Vehicle

Source: Trip Generation and Parking Generation Surveys, Housing for Seniors, Analysis Report, Hyder for the NSW Roads and Traffic Authority, June 2009, p14

SUPERSEDED

APPENDIX C3 –SENIORS LIVING, TRIPS PER OCCUPIED UNIT - WEEKENDS

	Sydney Metropolitan Area					Non-Metropolitan Area				
Site ID	**SH1**	**SH2**	**SH3**	**SH4**	**SH5**	**SH6**	**SH7**	**SH8**	**SH9**	**SH10**
No. of Occupied Units (Total)	**205**	**78**	**264**	**174**	**214**	**240**	**71**	**70**	**38**	**81**
Weekend										
Person-based Trips										
- Site Peak Hour	31	29	95	73	89	123	28	35	22	46
Trips/ Unit	0.15	0.37	0.36	0.42	0.42	0.51	0.55	0.50	0.58	0.57
- Vehicle Network Peak	13	16	76	44	47	123	6	35	15	37
Trips/ Unit	0.06	0.21	0.29	0.25	0.22	0.51	0.12	0.50	0.39	0.46
Daily Total Person Trips	163	151	620	373	483	452	119	111	114	182
Trips/ Units	0.80	1.94	2.35	2.14	2.26	1.88	2.33	1.59	3.00	2.25
Vehicle-based Trips										
- Site Peak Hour	20	15	56	46	50	85	15	20	11	33
Trips/ Unit	0.10	0.19	0.21	0.26	0.23	0.35	0.29	0.29	0.29	0.41
- Network Peak	9	11	45	30	31	79	3	18	6	27
Trips/ Unit	0.04	0.14	0.17	0.17	0.14	0.33	0.06	0.26	0.16	0.33
Daily Total Car Trips	95	95	334	241	268	312	56	65	58	131
Trips/ Unit	0.46	1.22	1.27	1.39	1.25	1.30	1.10	0.93	1.53	1.62
Daily Total CV Trips	10	2	22	7	16	3	0	0	2	3
Trips/ Unit	0.05	0.03	0.08	0.04	0.07	0.01	0.00	0.00	0.05	0.04
Daily Total Vehicle Trips	105	97	356	248	284	315	56	65	60	134
Trips/ Unit	0.51	1.24	1.35	1.43	1.33	1.31	1.10	0.93	1.58	1.65
% CV	9.5%	2.1%	6.2%	2.8%	5.6%	1.0%	0.0%	0.0%	3.3%	2.2%

* CV – Commercial Vehicle

Source: Trip Generation and Parking Generation Surveys, Housing for Seniors, Analysis Report, Hyder for the NSW Roads and Traffic Authority, June 2009, p14

SUPERSEDED

APPENDIX D1 – OFFICE BLOCKS – SITE DETAILS

	OB1 North Sydney	OB2 Chatswood	OB3 Sydney Olympic Park	OB4 Hurstville	OB5 Macquarie Park	OB6 Parramatta	OB7 Liverpool	OB8 Norwest	OB9 Newcastle	OB10 Wollongong
Total Staff	1,136 (1,129)	397 (347)	2,400 (2,053)	95 (85)	240 (240)	1,400 (1,225)	99 (88)	34 (31)	490 (490)	380 (300)
Size	31,400	10,214	34,131	3,254	5,748	27,000	2,817	1,200	12,182	12,921
Car and Bicycle Parking spaces	136	150	902	66	269	402	28	83	220	133
Loading Bays	1	6	7	0	3	3	0	1	0	1
Accessibility Score	0.9	0.9	0.4	0.9	0.9	0.9	0.9	0.6	0.9	0.9

Source: Trip Generation and Parking Generation Surveys (Office Blocks), GTA Consultants for the NSW Roads and Traffic Authority, September 2010, p113

SUPERSEDED

APPENDIX D2 – OFFICE BLOCKS – VEHICLE-BASED TRIP RATES

	OB1 North Sydney	OB2 Chatswood	OB3 Sydney Olympic Park	OB4 Hurstville	OB5 Macquarie Park	OB6 Parramatta	OB7 Liverpool	OB8 Norwest	OB9 Newcastle	OB10 Wollongong	Average
AM Peak Hour											
Trips	52	105	505	93	119	185	70	33	126	123	141
Trips/100m² GFA	0.17	1.03	1.48	2.86	2.07	0.69	2.49	2.75	1.03	0.95	1.55
PM Peak Hour											
Trips	44	86	481	60	106	166	48	14	139	100	124
Trips/100m² GFA	0.14	0.84	1.41	1.84	1.84	0.61	1.70	1.17	1.14	0.77	1.15
Daily											
Trips	387	710		623	906	1636	518	138	1615	838	819
Trips/100m² GFA	1.23	6.95		19.15	15.76	6.06	18.39	11.50	13.26	6.49	10.98
Road Network AM Peak Hour											
Trips	51	47	-	65	119	185	57	30	126	123	89
Trips/100m² GFA	0.16	0.46	-	2.00	2.07	0.69	2.02	2.50	1.03	0.95	1.19
Road Network PM Peak Hour											
Trips	44	36	-	60	72	75	46	10	137	100	64
Trips/100m² GFA	0.14	0.35	-	1.84	1.25	0.28	1.63	0.83	1.12	0.77	0.82

Source: Trip Generation and Parking Generation Surveys (Office Blocks), GTA Consultants for the NSW Roads and Traffic Authority, September 2010, p114

SUPERSEDED

APPENDIX D3 – OFFICE BLOCKS – PERSON-BASED TRIP RATES

	OB1 North Sydney	OB2 Chatswood	OB3 Sydney Olympic Park	OB4 Hurstville	OB5 Macquarie Park	OB6 Parramatta	OB7 Liverpool	OB8 Norwest	OB9 Newcastle	OB10 Wollongong	Average
AM Peak Hour											
Trips	397	249	842	119	142	387	95	34	172	158	260
Trips/100m² GFA	1.26	2.44	2.47	3.66	2.47	1.43	3.37	2.83	1.41	1.22	2.26
PM Peak Hour											
Trips	338	205	801	77	126	349	65	14	191	128	229
Trips/100m² GFA	1.08	2.01	2.35	2.37	2.19	1.29	2.31	1.17	1.57	0.99	1.73
Daily											
Trips	2,975	1,691	-	802	1,079	5,114	700	142	2,213	1,074	1754
Trips/100m² GFA	9.47	16.56	-	24.65	18.77	18.94	24.85	11.83	18.17	8.31	16.84
Road Network AM Peak Hour											
Trips	391	111	-	104	142	266	58	31	172	158	159
Trips/100m² GFA	1.25	1.09	-	3.20	2.47	0.99	2.06	2.58	1.41	1.22	1.81
Road Network PM Peak Hour											
Trips	338	90	-	67	86	298	48	10	190	128	139
Trips/100m² GFA	1.08	0.88	-	2.06	1.50	1.10	1.70	0.83	1.56	0.99	1.30

Source: Trip Generation and Parking Generation Surveys (Office Blocks), GTA Consultants for the NSW Roads and Traffic Authority, September 2010, p116

SUPERSEDED

APPENDIX E – BUSINESS PARKS AND INDUSTRIAL ESTATES – SITE DETAILS AND TRIP GENERATION

Traffic results summary

	Sydney areas				Non-Sydney areas						
Survey area ID	Site 1 Erskine Park Industrial Estate, Erskine	Site 2 Helensburgh Business Park, Helensburgh	Site 3 Wonderland Business Park, Eastern Creek	Site 4 Riverwood Business Park, Riverwood	Site 5 Tuggerah Business Park, Tuggerah	Site 6 Central Business Park, Albion Park Rail	Site 7 Anambah Business Park, Rutherford	Site 8 Freeway Business Park, Beresfield	Site 9 Shearwater Business Park, Taylors Beach	Site 10 Port Stephens Industrial Estate, Taylors	Site 11 Johnson Street Business Park, Dubbo
Date of survey	29/03/2012	28/03/2012	27/03/2012	28/03/2012	1/05/2012	8/05/2012	2/05/2012	1/05/2012	2/05/2012	2/05/2012	10/05/2012
Day of survey	Thursday	Wednesday	Tuesday	Wednesday	Tuesday	Tuesday	Wednesday	Tuesday	Wednesday	Wednesday	Thursday
Duration of survey	06:00-19:00	07:00-19:00	07:00-19:00	07:00-19:00	07:00-19:00	07:00-19:00	06:00-19:00	07:00-19:00	06:00-19:00	06:00-19:00	06:00-19:00
Surrounding area characteristics:											
Surrounding landuse (eg residential, commercial, open space, etc)	Commercial	Residential	Residential	Residential	Commercial	Residential	Open space	Commercial	Open space	Open space	Residential
Indicative Public Transport Accessibility Score	2	2	4	8	48	10	0	0.5	0.5	0.5	0
Principal adjacent road- AM peak period (weekday	8.00 to 9.00 am	8.30 to 9.30 am	7.30 to 8.30 am	8.15 to 9.15 am	8.00 to 9.00 am	8.00 to 9.00 am	8.00 to 9.00 am	7.00 to 8.00 am	8.00 to 9.00 am	8.00 to 9.00 am	8.00 to 9.00 am
Principal adjacent road - PM peak period (weekday	3.30 to 4.30pm	4.30 to 5.30pm	4.15 to 5.15pm	5.00 to 6.00pm	3.00 to 4.00pm	4.00 to 5.00pm	4.00 to 5.00pm	5.00 to 6.00pm	4.00 to 5.00pm	4.00 to 5.00pm	3.00 to 4.00pm
Principal adjacent road – daily peak period (weeke	1.00 to 2.00 pm	11.00 am to 12.00 p	12.15 to 1.15 pm	1.15 to 2.15 pm	11.00 am to 12.00	11.00 am to 12.00	2.00 to 3.00 pm	12.00 to 1.00 pm	11.00 am to 12.00	11.00 am to 12.00 pm	10.0 to 11.00 am
Estate characteristics:											
Year opened	2003	2011	2007	2004	2006	2000-2005	2008-2010	2005	2003-2005	2001-2005	Late 1980s
Total site area (hectares)	326.9	0.6	114.6	4.7	52.2	14.6	17.5	32.5	10.3	5.9	6.3
No. of units/lots (including vacant units/lots)	38	21	26	16	229	79	18	58	93	42	14
No. of occupied units/lots	36	13	22	16	184	66	18	52	44	27	14
Predominant business types within estate:											
no. of factories	5	0	0	0	6	0	1	5	0	0	1
no. of factories/warehouses	2	0	0	0	2	0	0	2	0	0	0
no. of warehouses	27	0	20	15	41	13	5	23	5	3	11
no. of offices	1	9	0	1	93	4	3	7	7	1	1
no of retailers	0	0	0	0	16	25	1	2	12	6	0
no. of workshops	1	0	0	0	0	9	3	7	6	1	0
no. of manufacturers	0	3	2	0	2	0	0	2	2	10	0
no. of others commercial businesses	0	1	0	0	23	15	5	2	12	5	1
Gross Floor Area in estate m^2 (occupied)	693,605	1,605	406,600	29,983	136,737	42,899	29,766	89,291	16,022	19,881	14,419
No. of employees	incomplete data from businesses			231	incomplete data from businesses		182	incomplete data from businesses			
Person Trips:											
Peak 1-hour person-trips	1294	29	927	173	1458	519	204	575	285	97	149
Time of peak 1-hour person-trips	14:45-15:45	14:45-15:45	14:00-15:00	08:15-09:15	16:30-17:30	16:15-17:15	15:00-16:00	07:00-08:00	16:15-17:15	15:00-16:00	16:15-17:15
Peak person-trips per business	35.9	2.2	42.1	10.8	8	7.9	11.3	11.1	6.5	3.6	10.6
Peak person-trips per hectare	4	49.4	8.1	37.0	28	35.6	11.6	17.7	27.7	16.5	23.6
Peak person-trips per 100 m^2 of GFA	0.187	1.807	0.228	0.577	1.066	1.210	0.685	0.644	1.779	0.488	1.033
Peak person-trips per employee	incomplete data from businesses			0.749	incomplete data from businesses		1.121	incomplete data from businesses			
Total daily person-trips	14056	168	9929	1410	12066	4205	2064	6399	2389	975	1316
Total daily person-trips per business	390.4	13.0	451.3	88	65.6	63.7	114.6	123.1	54.3	36.1	94.0
Total daily person-trips per hectare	43.0	287.0	86.6	301.5	231.4	288.7	117.6	197.1	232.0	165.5	208.8
Total daily person-trips per 100 m^2 of GFA	2.026	10.492	2.442	4.703	8.824	9.802	6.933	7.167	14.910	4.904	9.129
Total daily person-trips per employee	incomplete data from businesses			6.105	incomplete data from businesses		11.339	incomplete data from businesses			
Person-trips during adjacent road AM peak	976	24	789	173	1408	270	123	575	176	93	120
Person-trips during adjacent road PM peak	1073	7	858	94	1060	478	160	396	258	54	136
Vehicle Trips:											
Peak 1-hour vehicle-trips	1128	24	820	129	1256	418	173	504	209	78	116
Time of peak 1-hour vehicle-trips	14:45-15:45	14:45-15:45	08:00-09:00	08:15-09:15	08:00-09:00	16:15-17:15	15:00-16:00	07:15-08:15	16:15-17:15	15:00-16:00	15:00-16:00
Peak vehicle-trips per business	31	1.8	37.3	8.1	6.8	6.3	9.6	9.7	4.8	2.9	8.3
Peak vehicle-trips per hectare	3.5	40.9	7.2	27.6	24.1	28.7	9.9	15.5	20.3	13.2	18.4
Peak vehicle-trips per 100 m^2 of GFA	0.163	1.495	0.202	0.430	0.919	0.974	0.581	0.564	1.304	0.392	0.805
Peak vehicle-trips per employee	incomplete data from businesses			0.558	incomplete data from businesses		0.951	incomplete data from businesses			
Total daily vehicle-trips	13125	168	9384	1116	10383	4619	1793	5876	1921	751	1246
Total daily vehicle-trips per business	364.6	12.9	426.5	69.75	56.4	70.0	99.6	113.0	43.7	27.8	89.0
Total daily vehicle-trips per hectare	40.1	286.3	81.9	238.6	199.1	317.2	102.2	181.0	186.5	127.5	197.7
Total daily vehicle-trips per 100 m^2 of GFA	1.892	10.467	2.308	3.722	7.593	10.767	6.024	6.581	11.990	3.777	8.642
Total daily vehicle-trips per employee	incomplete data from businesses			4.83	incomplete data from businesses		9.85	incomplete data from businesses			
Vehicle-trips in adjacent road AM peak (Average)	1165	126	2749	1608	2594	1131	112	1645	670	670	315
Vehicle-trips in adjacent road PM peak (Average)	972	149	2593	1613	2844	1281	150	1789	805	805	341
Vehicle-trips during adjacent road AM peak	929	19	724	129	1256	246	111	495	147	64	108
Vehicle-trips during adjacent road PM peak	965	5	714	69	794	382	127	354	187	42	116
Average vehicle occupancy	1.10	1.10	1.12	1.16	1.17	1.16	1.17	1.17	1.26	1.19	1.15
% of total trips by principal mode:											
% Car (as driver)	62.5%	81.9%	63.2%	68.8%	79.1%	78.5%	70.0%	69.1%	74.3%	71.1%	66.1%
% Car (as passenger)	8.0%	8.3%	8.3%	12.3%	11.2%	13.4%	13.4%	9.6%	19.5%	14.1%	10.9%
% Commercial Vehicles	28.3%	4.2%	25.9%	12.6%	4.9%	6.2%	15.5%	18.3%	4.3%	8.9%	21.8%
% Bus	0.8%	0.0%	2.1%	0.5%	3.2%	0.0%	0.0%	2.2%	0.0%	0.0%	0.2%
% Cycle	0.1%	0.0%	0.3%	0.1%	0.3%	0.6%	0.2%	0.4%	0.8%	1.3%	0.1%
% Motorbike	0.1%	0.0%	0.0%	0.0%	0.3%	0.4%	0.0%	0.3%	0.9%	3.8%	0.2%
% On foot	0.1%	5.6%	0.2%	5.7%	1.1%	0.8%	0.6%	0.0%	0.3%	0.9%	0.4%
% Other	0.0%	0.0%	0.0%	0.0%	0.0%	0.0%	0.3%	0.0%	0.0%	0.0%	0.4%

Source: Trip Generation Surveys, Business Parks and Industrial Estates, TEF Consulting, in consultation with Gennaoui Consulting Pty Ltd, for the NSW RMS, December 2012, p5

SUPERSEDED

APPENDIX F1 – SHOPPING CENTRES – DETAILS OF SELECTED SITES

Site ID	Sydney Metropolitan Area							Regional Area		
	SC1 Roselands	SC2 Burwood	SC3 Liverpool	SC4 Penrith	SC5 Prairiewood	SC6 Rouse Hill	SC7 Warriewood	SC8 Mittagong	SC9 Shellharbour	SC10 Tuggerah
Network Peak Hours										
Year	2008	2011	2008	2009	2011	2008	2008	2008	2000	2004
AM Peak - Weekdays	7-8AM	8-9AM	8-9AM	8-9AM	8-9AM	8-9AM	8-9AM	9-10AM	8-9AM	8-9AM
PM Peak - Weekdays	5-6PM	3-4PM	4-5PM	4-5PM	5-6PM	5-6PM	5-6PM	4-5PM	3-4PM	3-4PM
Peak - Weekends	1-2PM	10-11AM	1-2PM	12-1PM	12-1PM	12-1PM	12-1PM	1-2PM	11AM-12PM	11AM-12PM
Site Details - Shopping Centre										
Gross Leasable Floor Area (m^2)	61,424	63,404	91,115	100,134	49,898	69,000	22,143	15,552	41,040	87,162
Year Constructed	1965	1966	1972	1971	1983	2008	1980	2007	1982	1995
Busy Peak Period	Saturday Midday	Saturday PM	Saturday Midday	Saturday Midday	Saturday Midday	Sunday Midday	Saturday Midday	Saturday Midday	Saturday Midday	Saturday Midday
Accessibility Score	40	233	268	200	96	184	64	22	67	105
Opening Hours										
Mon, Tue, Wed & Fri	9AM - 5:30PM	9AM - 5:30PM	9AM - 5:30PM	9AM - 5:30PM	9AM - 5:30PM	9AM - 5:30PM	9AM - 5:30PM	9AM - 5:30PM	9AM - 5:30PM	9AM - 5:30PM
Thu	9AM - 9PM	9AM - 9PM	9AM - 9PM	9AM - 9PM	9AM - 9PM	9AM - 9PM	9AM - 9PM	9AM - 9PM	9AM - 9PM	9AM - 9PM
Sat	9AM - 4PM	9AM - 5PM	9AM - 5PM	9AM - 5PM	9AM - 5PM	9AM - 5PM	9AM - 4PM	9AM - 5PM	9AM - 4PM	9AM - 5PM
Sun	10AM - 4PM	10AM - 5PM	10AM - 5PM	10AM - 4PM	10AM - 4PM	10AM - 5PM	10AM - 4PM	10AM - 4PM	10AM - 4PM	10AM - 4PM
Parking Spaces										
Customer	2,539	2,972	2,893	3,382	1,467	2,470	986	727	1,668	3,187
Disabled	67	38	78	60	35	75	18	16	44	66
Staff	140	-	514	-	369	553	-	5	-	-
Loading Bay/Reserved	90	23	29	110	15	38	20	16	12	4
Total	2,836	3,033	3,514	3,552	1,886	3,136	1,024	764	1,724	3,257
Survey Information										
Date of survey - Weekdays	25 & 26/11/10	24 & 25/03/11	19 & 20/05/11	7 & 8/04/11	28 & 29/04/11	17 & 18/03/11	3 & 4/03/11	10 & 11/03/11	5 & 6/05/11	12 & 13/05/11
- Weather	-	Sunny	Sunny	Sunny	Cloudy/Rain	Sunny/Cloudy	Sunny	Cloudy	Sunny	Sunny
Date of survey - Weekends	27 & 28/11/10	26 & 27/03/11	21 & 22/05/11	9 & 10/04/11	30/04 & 1/05/11	19 & 20/03/11	5 & 6/03/11	12 & 13/03/11	7 & 8/05/11	14 & 15/05/11
- Weather	-	Cloudy/Shower	Sunny	Sunny	Cloudy/Rain	Cloudy/Rain	Sunny	Cloudy/Rain	Sunny	Sunny

Source: Trip Generation and Parking Demand of Shopping Centres, Analysis Report, Halcrow for the NSW Roads and Traffic Authority, September 2011, p7

SUPERSEDED

APPENDIX F2 – SHOPPING CENTRES – PERSON TRIP RATES

Trips/100m^2 GLFA	Sydney Metropolitan Area							Regional Area		
	SC1 Roselands	SC2 Burwood	SC3 Liverpool	SC4 Penrith	SC5 Prairiewood	SC6 Rouse Hill	SC7 Warriewood	SC8 Mittagong	SC9 Shellharbour	SC10 Tuggerah
Total GLFA (m2)	61,424	63,404	91,115	100,134	49,898	69,000	22,143	15,552	41,040	87,162
Thursday										
Daily Person Trips	71.00	105.78	95.73	93.45	95.94	67.41	83.83	91.51	89.96	61.06
Peak Person Trips (per Hour)	6.65	9.96	8.50	8.70	8.29	7.58	8.89	9.81	8.40	5.51
Peak Network Hour Person Trips										
- AM Peak	2.75	3.05	3.97	5.63	4.38	2.13	3.11	5.81	5.92	2.59
- PM Peak	6.22	7.72	7.25	8.40	8.11	6.91	7.60	9.42	7.73	5.17
Friday										
Daily Person Trips	52.96	74.18	66.76	61.95	70.98	43.60	71.96	81.83	69.69	47.91
Peak Person Trips (per Hour)	6.47	9.93	8.94	8.81	9.53	5.72	8.68	10.42	8.78	5.39
Peak Network Hour Person Trips										
- AM Peak	2.58	3.49	3.39	4.50	3.52	2.02	3.25	6.53	3.62	2.35
- PM Peak	4.32	8.27	6.05	7.00	9.26	5.69	6.00	10.28	8.03	5.38
Saturday										
Daily Person Trips	67.75	93.11	77.39	69.01	80.97	69.92	83.35	92.28	86.43	55.01
Peak Person Trips (per Hour)	9.23	12.67	10.80	9.82	10.40	10.04	12.26	14.02	12.92	7.19
Peak Network Hour Person Trips	8.24	8.52	10.42	9.34	10.40	10.04	12.23	12.78	12.66	6.84
Sunday										
Daily Person Trips	54.88	84.27	61.68	48.95	63.71	65.34	67.77	73.86	47.76	46.26
Peak Person Trips (per Hour)	8.60	12.45	9.77	8.03	9.67	10.16	10.99	12.49	7.84	7.11
Peak Network Hour Person Trips	8.52	8.88	9.75	8.02	9.30	8.97	9.53	10.74	7.82	6.27

Source: Trip Generation and Parking Demand of Shopping Centres, Analysis Report, Halcrow for the NSW Roads and Traffic Authority, September 2011, p21

SUPERSEDED

APPENDIX F3 – SHOPPING CENTRES – VEHICLE TRIP RATES

Trips/100m^2 GLFA	Sydney Metropolitan Area							Regional Area		
	SC1 Roselands	SC2 Burwood	SC3 Liverpool	SC4 Penrith	SC5 Prairiewood	SC6 Rouse Hill	SC7 Warriewood	SC8 Mittagong	SC9 Shellharbour	SC10 Tuggerah
Total GLFA (m2)	61,424	63,404	91,115	100,134	49,898	69,000	22,143	15,552	41,040	87,162
Thursday										
Daily Vehicle Trips	43.76	34.03	29.51	34.27	60.18	42.22	59.60	60.67	54.99	38.92
Peak Vehicle Trips (per Hour)	3.90	3.10	2.71	3.24	5.21	4.40	6.01	6.21	5.25	3.49
Peak Network Hour Vehicle Trips										
- AM Peak	1.84	0.96	1.01	2.12	2.88	1.43	2.24	4.08	4.06	1.87
- PM Peak	3.72	2.57	2.22	3.14	4.96	4.17	5.19	5.77	4.92	3.31
Friday										
Daily Vehicle Trips	33.46	23.73	21.37	23.80	45.19	28.96	50.92	55.48	46.05	32.05
Peak Vehicle Trips (per Hour)	4.01	3.08	2.84	3.26	5.71	3.63	5.90	6.71	5.75	3.53
Peak Network Hour Vehicle Trips										
- AM Peak	1.65	0.98	1.04	1.54	1.87	1.37	2.42	4.69	2.61	1.70
- PM Peak	2.69	2.66	1.95	2.73	5.49	3.61	4.00	6.41	5.21	3.53
Saturday										
Daily Vehicle Trips	37.20	29.08	23.98	26.09	46.87	39.37	49.61	50.18	48.59	30.32
Peak Vehicle Trips (per Hour)	5.06	3.77	3.16	3.56	5.83	5.60	7.00	7.48	7.04	3.85
Peak Network Hour Vehicle Trips	4.43	2.97	3.04	3.43	5.83	5.60	6.93	6.89	6.99	3.77
Sunday										
Daily Vehicle Trips	30.65	27.00	18.25	19.21	34.71	32.77	39.43	39.78	25.10	24.72
Peak Vehicle Trips (per Hour)	4.79	4.08	2.81	3.13	5.08	5.00	6.25	6.60	4.08	3.76
Peak Network Hour Vehicle Trips	4.79	3.03	2.77	3.04	4.97	4.30	5.58	5.63	4.08	3.31

Source: Trip Generation and Parking Demand of Shopping Centres, Analysis Report, Halcrow for the NSW Roads and Traffic Authority, September 2011, p22

SUPERSEDED

APPENDIX G1 – BULKY GOOD RETAIL – SITE DETAILS

Site ID	BG1	BG2	BG3	BG4	BG5	BG6
Name	Freedom/	Harvey Norman	Retravision	Domayne	Bing Lee	Fantastic
Suburb	Balgowlah	Auburn	Springwood	Kotara	Warilla	South Nowra
	2093	2144	2777	2289	2528	2541
Region	Sydney	Sydney	Blue Mountain	Newcastle	Southern	Southern
Network Peak Hours						
Year of Network Survey Dates	2005	2007	2005	2004	2007	2009
						18/3-24/3
AM Peak - Weekdays	0800-0900	0800-0900	0800-0900	0800-0900	0800-0900	0800-0900
PM Peak - Weekdays	1700-1800	1700-1800	1700-1800	1600-1700	1500-1600	1500-1600
Peak - Weekends	1200-1300	1200-1300	1100-1200	1200-1300	1100-1200	1100-1200
Site Details - Bulky Goods/Hardware						
Area Dimension (m^2)		Approx 9000	1,600			
Gross floor area (m^2)	4,300	25,384 (including car park)	600	6,029	1,200	1,700
No. of Employee (Total)	29	220	5			9
No. of employee (at one time)	10	100	5	50	20	9
Year Constructed	Unknown	2001			2008	
Accessibility Score	80-139	<79	<79	78	26	0
Opening Hours						
Mon-Fri	0900-1800	0900-1730	0900-1730	0900-1730	0900-1730	0900-1730
Sat	0900-1700	0900-1730	0900-1600	0900-1700	0900-1700	0900-1700
Sun	1000-1700	0900-1730	1000-1600	1000-1700	1000-1700	1000-1700
Parking Spaces						
Customers	43	338	13	151	51	30
Disabled	0	12	0	2	4	4
Staff	3	0	0	0	33	9
Loading Bay	4		1	1	4	2
Total	50	350	14	154	92	45
Survey Results						
Date of Survey - Weekdays	19/03/09	12/03/09	12/03/09	12/03/09	19/03/09	26/03/09
	(Thurs)	(Thurs)	(Thurs)	(Thurs)	(Thurs)	(Thurs)
Weather	Sunny	Sunny	Sunny	Sunny/Cloudy	Sunny/Cloudy	Sunny
Date of Survey - Weekend	21/03/09	14/03/09	14/03/09	14/03/09	21/03/09	28/03/09
	(Sat)	(Sat)	(Sat)	(Sat)	(Sat)	(Sat)
Weather	Sunny/Shower	Sunny	Sunny	Sunny/Cloudy	Sunny/Cloudy	Sunny

Source: Trip Generation and Parking Generation Surveys, Bulky Goods/Hardware Stores, Analysis Report, Hyder Consulting for the NSW Roads and Traffic Authority, May 2009, p8

SUPERSEDED

APPENDIX G2 – BULKY GOODS RETAIL –TRIP GENERATION

Trips/ 100m² GFA	Sydney Metropolitan Area BG1 to BG3			Non-Metropolitan Area BG4 to BG6			All Survey Sites BG1 to BG6			Avg Non-metro / Metro %
	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg	
Weekdays										
Person-based Trips										
- Site Peak Hour	2.42	7.00	4.33	2.64	7.83	4.69	2.42	7.83	4.51	108.2%
- Vehicle Network AM Peak	Network AM peak is outside of opening hours									
- Vehicle Network PM Peak	1.33	2.03	1.68	1.72	4.58	2.99	1.33	4.58	2.46	178.1%
Daily Total Person Trips	15.88	36.33	24.52	19.41	49.92	30.38	15.88	49.92	27.45	123.9%
Vehicle-based Trips										
- Site Peak Hour	1.42	4.33	2.44	1.96	4.75	2.92	1.42	4.75	2.68	119.8%
- Network AM Peak	Network AM peak is outside of opening hours									
- Network PM Peak	0.81	1.21	1.01	1.12	2.25	1.51	0.81	2.25	1.31	149.0%
Daily Total LV Trips	10.16	22.17	14.69	10.00	26.58	17.16	10.00	26.58	15.92	116.8%
Daily Total HV Trips	0.00	3.00	1.07	0.20	2.33	0.92	0.00	3.00	1.00	86.2%
Daily Total Vehicle Trips	10.37	25.17	15.76	10.24	28.92	18.08	10.24	28.92	16.92	114.7%
Peak Parking Accumulation	0.65	3.17	1.57	0.41	2.00	1.03	0.41	3.17	1.30	65.6%
Weekend										
Person-based Trips										
- Site Peak Hour	4.63	11.83	7.90	5.59	14.17	8.67	4.63	14.17	8.28	109.7%
- Vehicle Network Peak	3.81	4.92	4.36	3.12	8.33	5.49	3.12	8.33	4.92	125.9%
Daily Total Person Trips	25.09	39.40	33.72	23.94	70.83	42.37	23.94	70.83	38.05	125.7%
Vehicle-based Trips										
- Site Peak Hour	2.23	6.17	3.75	2.76	5.67	3.94	2.23	6.17	3.85	105.1%
- Vehicle Network Peak	1.70	2.83	2.24	1.35	4.00	2.72	1.35	4.00	2.48	121.4%
Daily Total LV Trips	11.42	19.83	16.05	10.47	33.67	20.81	10.47	33.67	18.43	129.6%
Daily Total HV Trips	0.00	0.33	0.11	0.03	0.50	0.22	0.00	0.50	0.16	195.2%
Daily Total Vehicle Trips	11.42	20.17	16.16	10.59	34.17	21.02	10.59	34.17	18.59	130.1%
Peak Parking Accumulation	0.91	2.17	1.57	0.35	2.25	1.15	0.35	2.25	1.36	73.2%
Weekend / Weekdays %										
Person-based Trips										
- Site Peak Hour	191.3%	242.9%	259.9%	180.7%	181.8%	183.8%	235.2%	181.8%	199.9%	
Daily Total Person Trips	158.0%	108.4%	137.5%	123.3%	141.9%	139.5%	150.7%	141.9%	138.6%	
Vehicle-based Trips										
- Site Peak Hour	157.4%	142.3%	154.0%	141.3%	119.3%	135.0%	157.4%	129.8%	143.6%	
Daily Total LV Trips	112.4%	89.5%	109.3%	104.7%	126.6%	121.2%	104.7%	126.6%	115.7%	
Daily Total HV Trips	0.0%	11.1%	10.4%	16.7%	21.4%	23.5%	0.0%	16.7%	16.5%	
Daily Total Vehicle Trips	110.1%	80.1%	102.6%	103.4%	118.2%	116.3%	103.4%	118.2%	109.9%	
Peak Parking Accumulation	139.3%	68.4%	99.9%	85.7%	112.5%	111.5%	85.7%	71.1%	104.5%	

Source: Trip Generation and Parking Generation Surveys, Bulky Goods/Hardware Stores, Analysis Report, Hyder Consulting for the NSW Roads and Traffic Authority, May 2009, p20

SUPERSEDED

APPENDIX H1 – HARDWARE AND BUILDING SUPPLIES – SITE DETAILS

Site ID	HW1	HW2	HW3	HW4	HW5	HW6	HW7	HW8	HW9
Name	Bunnings	Bunnings	Mitre10	Bunnings	Mitre10	Mitre10	Mitre10	Bunnings	Mitre10
Suburb	North Parramatta	Bankstown Airport	Windsor	Minchinbury	Narellan	Morisset	Picton	South Nowra	Orange
	2152	2200	2756	2770	2567	2264	2571	2541	2800
Region	Sydney	Sydney	Sydney	Sydney	Sydney	Northern	Northern	Northern	Southern
Network Peak Hours									
Year of Network Survey	2007	2005	2007	2007	2005	2004	2009	2009	2005
Dates							6/4-12/4	18/3-24/3	
AM Peak - Weekdays	0800-0900	0700-0800	0800-0900	0800-0900	0800-0900	0800-0900	0900-1000	0800-0900	0800-0900
PM Peak - Weekdays	1700-1800	1600-1700	1500-1600	1700-1800	1600-1700	1600-1700	1600-1700	1500-1600	1600-1700
Peak - Weekends	1200-1300	1200-1300	1100-1200	1100-1200	1100-1200	1100-1200	1200-1300	1100-1200	1100-1200
Site Details - Bulky Goods/Hardware									
Area Dimension (m^2)			6,700		3,500		3,600		Unknown
Gross floor area (m^2)	9,800	14,111	1,800	11,915	2,400	2,000	1,600	9,948	1,800
No. of Employee (Total)			42		20		12		23
No. of employee (at one time)			34		15	15	12		8
Year Constructed			1990		1991-1992		Unknown		1980
Accessibility Score	<79	<79	<79	<79	<79	0.5	1	0	2
Opening Hours									
Mon-Fri	0700-2100	0700-2100	0630-1700	0700-2100	0700-1730	0630-1730	0730-1700	0700-2100	0700-1730
Sat	0800-1800	0800-1800	0800-1600	0800-1800	0730-1600	0700-1600	0700-1600	0800-1800	0800-1600
Sun	0800-1800	0800-1800	0900-1500	0800-1800	0900-1600	0700-1600	0900-1400	0800-1800	0900-1600
Parking Spaces									
Customers	263	464	44	397	35	29	75	209	28
Disabled	2	8	0	6	2	1	0	4	2
Staff			0		0	0	0		10
Loading Bay			2		1	0	5		2
Total	265	472	46	403	38	30	80	213	42
Survey Results									
Date of Survey - Weekdays	12/03/09 (Thurs)	26/03/09 (Thurs)	19/03/09 (Thurs)	19/03/09 (Thurs)	19/03/09 (Thurs)	12/03/09 (Thurs)	26/03/09 (Thurs)	26/03/09 (Thurs)	19/03/09 (Thurs)
Weather	Sunny	Sunny	Sunny	Sunny	Sunny	Sunny	Sunny	Sunny/ Rain Evening	Sunny
Date of Survey - Weekend	14/03/09 (Sat)	28/03/09 (Sat)	21/03/09 (Sat)	21/03/09 (Sat)	21/03/09 (Sat)	14/03/09 (Sat)	28/03/09 (Sat)	28/03/09 (Sat)	21/03/09 (Sat)
Weather	Sunny	Sunny	Sunny	Sunny	Sunny	Sunny/ Rain Evening	Sunny	Sunny	Sunny

Source: Trip Generation and Parking Generation Surveys, Bulky Goods/Hardware Stores, Analysis Report, Hyder Consulting for the NSW Roads and Traffic Authority, May 2009, p7

SUPERSEDED

APPENDIX H2 – HARDWARE AND BUILDING SUPPLIES – TRIP GENERATION

Trips/ 100m² GFA	Sydney Metropolitan Area HW1 to HW5			Non-Metropolitan Area HW6 to HW9			All Survey Sites HW1 to HW9			Avg Non-metro / Metro %
	Min	Max	Avg	Min	Max	Avg	Min	Max	Avg	
Weekdays										
Person-based Trips										
- Site Peak Hour	4.00	5.77	5.06	3.95	6.40	5.49	3.95	6.40	5.25	108.6%
- Vehicle Network AM Peak	0.65	2.72	2.01	1.28	4.75	2.97	0.65	4.75	2.43	147.9%
- Vehicle Network PM Peak	2.48	4.89	3.50	2.79	4.65	3.78	2.48	4.89	3.63	108.0%
Daily Total Person Trips	32.88	53.26	42.42	29.22	43.40	38.34	29.22	53.26	40.61	90.4%
Vehicle-based Trips										
- Site Peak Hour	3.15	4.67	4.03	2.74	5.60	4.41	2.74	5.60	4.20	109.6%
- Network AM Peak	0.60	2.22	1.68	1.09	3.88	2.50	0.60	3.88	2.05	148.7%
- Network PM Peak	2.05	3.56	2.70	1.99	3.80	3.03	1.99	3.80	2.85	112.5%
Daily Total LV Trips	25.21	38.25	30.59	20.66	35.90	30.30	20.66	38.25	30.46	99.0%
Daily Total HV Trips	0.99	6.17	2.40	0.69	2.25	1.49	0.69	6.17	2.00	62.0%
Daily Total Vehicle Trips	26.80	39.75	32.99	21.35	38.15	31.79	21.35	39.75	32.46	96.4%
Peak Parking Accumulation	0.78	1.67	1.16	1.05	1.90	1.48	0.78	1.90	1.30	127.8%
Weekend										
Person-based Trips										
- Site Peak Hour	6.83	10.54	9.11	7.43	9.20	8.11	6.83	10.54	8.66	89.0%
- Vehicle Network Peak	6.00	10.44	8.59	6.67	8.70	7.53	6.00	10.44	8.12	87.6%
Daily Total Person Trips	36.94	74.39	59.25	40.17	49.90	44.66	36.94	74.39	52.76	75.4%
Vehicle-based Trips										
- Site Peak Hour	4.28	6.69	5.91	4.49	6.17	5.28	4.28	6.69	5.63	89.3%
- Vehicle Network Peak	3.61	6.33	5.33	4.28	5.33	4.92	3.61	6.33	5.15	92.3%
Daily Total LV Trips	22.00	48.78	38.42	28.24	32.20	30.68	22.00	48.78	34.98	79.9%
Daily Total HV Trips	0.13	0.89	0.52	0.00	0.25	0.13	0.00	0.89	0.35	24.5%
Daily Total Vehicle Trips	22.89	49.05	38.94	28.39	32.45	30.81	22.89	49.05	35.33	79.1%
Peak Parking Accumulation	1.50	2.59	2.00	1.45	2.81	1.82	1.45	2.81	1.92	91.3%
Weekend/Weekdays %										
Person-based Trips										
- Site Peak Hour	170.7%	213.6%	245.4%	238.6%	187.1%	199.1%	241.9%	213.6%	224.0%	
Daily Total Person Trips	112.4%	139.7%	139.7%	137.5%	115.0%	116.5%	126.4%	139.7%	129.9%	
Vehicle-based Trips										
- Site Peak Hour	136.0%	143.4%	146.9%	163.7%	110.1%	119.8%	155.9%	119.5%	134.2%	
Daily Total LV Trips	87.3%	127.5%	125.6%	136.7%	89.7%	101.3%	106.5%	127.5%	114.8%	
Daily Total HV Trips	12.7%	14.4%	21.7%	0.0%	11.1%	8.6%	0.0%	14.4%	17.4%	
Daily Total Vehicle Trips	85.4%	123.4%	118.0%	133.0%	85.1%	96.9%	107.2%	123.4%	108.8%	
Peak Parking Accumulation	192.9%	155.3%	171.9%	138.7%	148.0%	122.9%	186.4%	148.0%	147.2%	

Source: Trip Generation and Parking Generation Surveys, Bulky Goods/Hardware Stores, Analysis Report, Hyder Consulting for the NSW Roads and Traffic Authority, May 2009, p16

SUPERSEDED

Submission Type

I am making a personal submission

Title

Mrs

First Name

Maureen

Family name

Willcock

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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No

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submission

Please see attached Submission dated 12 January, 2026.

Montefiore Seniors Living Proposal (PP-2023-1109)

Submission

Summary

1. We do not object to the redevelopment of the Montefiore site for the purpose of constructing **Seniors Housing** in the forms of Independent Living Units (**ILUs**) and retaining a reduced number of Residential Aged Care Facility (**RACF**) beds. However, we believe that the proposed development is too large.

2. We have 3 objections to the exhibited Montefiore Seniors Living Proposal (the **Montefiore Seniors Living Proposal**):
    a. the permissible building height for the building which is identified as Building B should be 8.5 metres, not 18 metres;
    b. the scale of the Montefiore Seniors Living Proposal should be reduced to a scale which is consistent with the principles for medium density ILUs which are set out in the NSW Government's ***Seniors Housing Design Guide*** published in November, 2023; and
    c. the permitted uses of all development on the Montefiore site should be limited to **seniors housing**, not **ancillary use, communal facility, allied health, conventional residential housing, staff housing, restaurant and café** as now proposed**.**

Discussion

3. The intended outcomes of the Montefiore Seniors Living Proposal are stated to be:

    To rezone the part of the land from R2 low density to SP2 Infrastructure (Seniors Housing) to facilitate the delivery of additional seniors housing.[1]

4. The current zoning of the site (R2) permits the continued use of the site for seniors housing.

5. The effect of and reason for seeking to rezone the site SP 2 Infrastructure (Seniors Housing) is to increase the site density from the current Low Density to Medium Density Seniors Housing.

6. The Montefiore Seniors Living Proposal envisages that the increased density for seniors housing will comprise ILUs located in:

    a. 1 x 1 storey building in Gaza Avenue
    b. 3 x 2 storey buildings in Gaza Avenue;
    c. 1 x 4 storey building located on Barons Crescent to the west of the existing synagogue (**Building A**); and
    d. 2 x 6 storey buildings located in the centre of the site (**Buildings C and D**).

[1] See Par. 6.2 Intended Outcomes.

7. The actual number of planned ILUs is not clear. Buildings A, C and D are stated to comprise 112 ILUs.[2] No reference is made to the number of ILUs, if any, which will be included within the 4 buildings in Gaza Avenue.

Building B

8. The Montefiore Seniors Living Proposal also envisages that a second 4 storey building will be located on Barons Crescent, to the east of the existing synagogue (**Building B**). However, this building will not be used for seniors housing.

9. The intended use of Building B has changed from ILUs to other uses which are variously described in the exhibited documents as ***ancillary use, communal facility, allied health, conventional residential housing, staff housing, restaurant and café.***

10. As there will be no ILUs in Building B, the premise on which the Montefiore Seniors Living Proposal rests falls away, at least so far as it relates to Building B.

11. The proposed development of Building B to be used as a 4 storey mixed use building in a residential location, is not consistent with stated objective of providing additional seniors housing.

12. There is no need to rezone the parcel(s) of land on which Building B is to be located. In the same way that the RACF land has now been excluded from the rezoning and will remain zoned R2, Lot 2 in DP312298 should remain zoned R2 and be excluded from any rezoning. Alternatively, to the extent that Building D encroaches upon Lot 2, any rezoning should only permit increased building height for Building D.

Medium Density or High Density development?

13. The NSW Government published the ***Seniors Housing Design Guide*** in November, 2023. The *Seniors Housing Design Guide* distinguishes between low, medium and high density seniors housing and gives the following guidance[3]:

> **Medium density**
>
> ***Medium density*** *seniors housing is often found in residential localities with residential zonings. Medium density FSR is typically 0:5:1 or more*.
>
> ***10.5*** *Medium density independent living development is often two or three storey on sites where residential flat buildings are not permitted and has multiple dwellings, usually accessed from a single driveway to carparking*.

[2] Montefiore Hunters Hill Planning Proposal – Transport Impact Assessment, 30 September, 2025 at s.*3 Planning Proposal 3.1 Overview.*

[3] **NSW Government Department of Planning, *Seniors Housing Guide*** at pages 60-62.

14. The Montefiore Seniors Living Proposal should be assessed having regard to the ***Seniors Housing Design Guide.***

15. Following this guidance, future seniors housing development on the Montefiore site ought to be restricted to 2 or 3 storey medium density ILUs – because the site:
    a. is located in a residential locality,
    b. where residential flat buildings are not permitted and
    c. is proposed to be developed to comprise multiple dwellings.

16. The building heights which are currently proposed exceed the guidance for medium density ILUs. The proposed building heights for Buildings A, B, C and D should be limited to 2 or 3 storeys in accordance with the ***Seniors Housing Design Guide*** guidance for medium density seniors housing.

Expanded permitted uses

17. The Montefiore Seniors Living Proposal has also recently sought to expand the permitted uses for the site to now include the following ***additional*** permitted uses:
    - conventional residential housing,
    - restaurant and
    - café.

    Each of these additional permitted uses implies that business and commercial property activities will be conducted on the site. The documents which are exhibited provide no detailed information about these uses and no assessment of their impacts.

18. The existing permitted uses for the sit do not permit mixed-use development.

19. Expanding the permitted uses of the site beyond the current permitted uses is not consistent with the stated objective of the Montefiore Seniors Living Proposal, namely, to provide additional seniors housing.

20. The late inclusion of these additional permitted uses and the vagueness with which Montefiore has described how it plans to use the site (in particular Building B) modifies the Planning Proposal from one which is said to be directed to seniors housing to a mixed-use development.

21. The permitted uses of the site should not be changed. The proposed expanded permitted uses should not be made.

Maureen Willcock (sgd) **Richard Willcock (sgd)**

12 January, 2026

Note: we request that our address and contact details not be published.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

I am writing to object to the Montefiore's planning proposal that is now on public exhibition. I reject the submission that there should be up to 24 m high buildings one block back from me. Not only will this proposal cause traffic jams down small streets, but it will also cause loss of sunlight into many homes on my street and surrounds. The charm of Hunters Hill is due to the many low rise buildings, spread apart and it is very quiet. This will absolutely change the quality of life of residents such as myself. This will change the nature of Boronia Park nearby. Boronia Park is full of natural flora and fauna that is precious to the people that live in this area and for greater Sydney. The changes from such a big development will make a huge impact on the local surrounds. I am completely against any development of any building proposal greater than 2 stories high.

Submission Type

I am making a personal submission

Title

Mr

First Name

A

Family name

McLachlan

☐ Name withheld

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Email

[redacted]

Suburb/ Town

HUNTERS HILL

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submission

With regard the Montefiore development, we would like to ensure:
- trees on the street scape of Barons Crescent (particularly between Gaza ave and Thorn St)remain and are protected during and post development
- there should be a maximum height of 2 storeys along Gaza Ave and Barons Crescent to preserve the current street scape and not result in a buildout along the street with 4 storey buildings. These would be better suited (if required) centrally on the Montefiore site. Note, the drawing in the urban design report is worrying as it assume Barons Crescent residents will look over the tree tops to the development complex when in fact the view is under the canopy at street level. If for whatever reasons that they want a 4 storey

building as the first tier of building then it needs to be set back from the street with an internal row of trees to screen.
- car parking for the development needs to accomodate for residents, staff and guests to avoid congestion of the limited residential street parking and also to sustain access along Barons Crescent which is already narrow and needs to accomodate the 538 Bus Service. Ideally we do not want excess parking that would lead to council applying parking permits for residents as this limits Barons and Gaza street residents accomodating guest street parking. The current proposal allows for 17 visitors for the proposed 131 residents aka 17.5% visitors. This needs to be increased to avoid additional congestion on the street. Similarly the parking to cater for peak staff levels should be reconsidered and ideally expanded. Staff using street parking will occupy kerbsides for longer durations and this will impact residents and our parking options leading to street congestion. Barons Crescent struggles with congestion when you max out parking on both sides of the street. This impacts the government bus service.
- the development should ensure that it retains all bus stops for the 538 bus service
- vehicle access to the site during development and post development from Barons Crescent needs to be minimised to avoid impact on residents and also traffic congestion for traffic and buses as experienced with the current deliveries to the site (and noted in your documents)

Submission Type

I am making a personal submission

Title

Ms

First Name

Jill

Family name

Livingstone

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

Pleas see attached pdf submission

8 Thorn Street
Hunters Hill 2110
17 January 2026

Ms Louise McMahon
Director
Planning Proposal Authority
NSW Department of Planning, Housing and Infrastructure

Dear Ms McMahon

Re: PP-2023-1109 – Montefiore Seniors Living Proposal.

Thank you for the opportunity to make a submission in respect of PP-2023-1109 – Montefiore Seniors Living Proposal.

To provide some context to our submission, we have lived in Thorn Street, off Barons Crescent and very close to Montefiore since 1991.

During that time Montefiore has been a quiet and non intrusive neighbour, except for its delivery access in Barons Crescent.

We are not opposed in principle to the Montefiore redevelopment, however we do have concerns about scale, access and safety issues inherent in the proposal.

Access

During the time we've lived in this area, there's been an incremental growth in the number of cars, to the extent that when cars are commonly parked on either side of Barons Crescent, only one vehicle is able to drive down the street. Any proposal to further increase traffic as shown in the latest Montefiore proposal will further crowd a street not built for the level of likely traffic. As local residents and walkers in the area, it seems way more logical and fairer to residents if High Street is the only access to the site. If the proposal allowed the extension of High Street for a further entrance, or if the heritage gardens could be sacrificed for the convenience of the neighbourhood, this would be a much more acceptable and less intrusive solution.

Scale

Montefiore is located in a quiet residential suburb. The proposal to construct 4 storey buildings along Barons Crescent is completely out of keeping with the neighbourhood and sets a precedent for other developers. As residents we oppose this height but would be happy to see two storey construction in keeping with the area and current building heights.

Safety

There are safety considerations around constructing and housing large numbers of aged residents in multi storey dwellings along Barons Crescent. The area has a bushfire overlay and in the event of a bushfire it would be difficult to safely evacuate a large number of vulnerable people from a crowded residential street.

Thorn Street already has an important piece of infrastructure – the Sydney Water Northside Tunnel pumping station which needs to be protected in a bushfire situation. If the Montefiore proposal is accepted there will be only one point of access to both the pumping station and to the multi storey accommodation for aged Montefiore residents. This potentially could create a serious bottleneck and endanger lives.

Thank you for the opportunity to make a submission to the Montefiore proposal. We do hope that the final outcome provides for the safety and amenity of all residents of this neighbourhood.

Yours sincerely

Jill Livingstone and Philip Nelson

Submission Type

I am making a personal submission

Title

Mr

First Name

William Mark

Family name

Ovens

☐ Name withheld

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Email

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Suburb/ Town

Hunters Hill

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submission

The proposal to build 2,3 & 6 storey buildings up to 24 m high is 3 times the current limit will set a dangerous precedent in Hunters Hill. Major developers will be watching this as they seek to build higher larger structures in the Hunters Hill area. There is no railway station nearby, and traffic is already busy with the "dead end" road as well as putting pressure on street parking. Such a proposal was rejected by Hunters Hill Council in 2023 and residents also have totally rejected it.

Submission Type

I am making a personal submission

Title

Ms

First Name

Felicity

Family name

Gabbrielli

☐ Name withheld

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Email

[redacted]

Suburb/ Town

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submission

Regarding your proposal to redevelop and massively increase the buildings on the Montefiore site in Hunters Hill:

I am appalled by this proposal and want to object vehemently to its approval, and above all to the size of the project and the impact it will have on our suburban streets and the liveability of our area. This proposal was rejected by Council in 2023 and the community was horrified by the idea, and rejected it too.

Now you come back with an even bigger proposal, three times higher than our current limits.

Not only are you proposing building (possibly expensive) apartments for well-off retirees, you are closing available beds for AGED CARE residents who should have precedence over the fancy apartments.

This smacks of a money-making exercise and is not of any help in the shortage of aged care facilities, which one would think would be the major preoccupation of Montefiore.

Consider your neighbours as well as the good of the community, Montefiore. This is TOO BIG.

Submission Type

I am making a personal submission

Title

Mr

First Name

Charles

Family name

Chessell

☐ Name withheld

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submission

As a local Hunters Hill resident with a young family, I am writing to object to the Montefiore Senior Living Proposal on the following grounds:

1. Infrastructure Capacity and Integration
The proposal does not demonstrate that existing local infrastructure can safely or effectively accommodate a development of this scale. The applicant’s Traffic & Access Report fails to reflect long standing, well documented problems experienced by residents, including limited parking, road safety concerns, and recurring near miss incidents.

The surrounding street network—High Street, Barons Crescent, and Gaza Avenue—is a narrow, low density residential road system never designed to handle high volumes of traffic. On street parking already constrains vehicle movement to the point where two cars often cannot safely pass each other. Adding large volumes of new vehicles linked to residents, staff, visitors, service operations, medical transport, and waste collection would significantly worsen congestion and risk.
Public transport options are limited, meaning reliance on private cars will remain high. Historical traffic issues, including rat running and unsafe intersections, are unresolved and would be further intensified. Rezoning that increases density without guaranteed infrastructure upgrades contradicts the EP&A Act's principles of orderly and economic development. Any required upgrades would likely fall on local ratepayers unless the proponent commits funding, raising the risk of community borne costs for a development that primarily benefits a private operator.

2. Local Demand and Proposal Objections
The proposal is misaligned with actual local demand for seniors' services. It removes roughly 140 high care beds, eliminating around 30% of Hunters Hill's existing high care capacity at a time when demand for high care support continues to rise. This would create a significant undersupply for frail seniors who depend on residential aged care.
Conversely, the proposal introduces 144 Independent Living Units, a quantity well above local need. Evidence shows that most seniors do not enter retirement living until ages 75–81, and more than half (58%) now choose to remain at home under ageing in place trends. National and NSW data show a 283% increase in home care uptake since 2017, confirming that the strongest growth in demand is for in home support.

3. Local Character Impact
The proposed development's bulk, height, and massing are fundamentally incompatible with the existing R2 low density residential environment. The design—incorporating multi storey forms including a six storey ILU tower, four storey administration building, and two storey structures along Gaza Avenue—would dominate the surrounding area and significantly alter its character.
The proposal disrupts the established suburban streetscape, reducing the sense of openness, overshadowing surrounding homes, and impacting the daily outlook and amenity of neighbouring residents.
Traffic operations, frequent deliveries, service vehicles, and visible infrastructure would further erode the low density residential character. Approving such a large scale development would set a precedent for future high density proposals in an area whose planning controls intentionally preserve low rise suburban character.

4. Community Benefit
Under the SP2 zone, proposals must deliver a measurable community benefit. The development provides no substantial improvements to the Hunters Hill community facilities, services, or social infrastructure. Rather than enhancing wellbeing for seniors or the broader Hunters Hill community, it diminishes essential high care capacity and provides benefits that primarily serve the proponent's commercial interests.

Submission Type

I am making a personal submission

Title

Mrs

First Name

Susan

Family name

Wise

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

I live in High street Hunters Hill and we are impacted by the parking of staff and visitors. During the day parking is usually not available outside our home for visitors and friends.

The more serious issue is the illegal use of the roads by mobility scooters and electric wheelchairs by resident of Montifiore home. This is very dangerous as they not only go on the roads in High street but speed through the roundabouts and along Park road often in the middle of the street on the crest of the hill making them difficult to see and a hazard.

I have contact Montifiore home about the reckless and dangers behaviour of these residents with no changes or feedback.

I feel that an increase of residents will only increase the number of dangerous use of the roads by residents with mobility assistance technology.

I am a retired Nurse with my Masters in Nursing. My specialty is Aged and Palliative care. My career in aged care included supporting elderly people in their own homes, also residential care as well as involvement in the aged care clinics at RNS hospital.

I support the use of appropriate technology for people with mobility issues but only if not impacting the safety of others.

PLEASE REJECT THE PROPOSAL for changes to Montifiore. As increasing resident numbers will only increase the number of potential hazards on the roads.

Submission Type

I am making a personal submission

Title

Mr

First Name

Henricus

Family name

Van Den Berg

☐ Name withheld

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Email

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Suburb/ Town

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submission

This submission relates to the Planning ProposalPP-2023-1109 Montefiore Seniors Living proposal.

I strongly object to the proposal.

The following reasons support my objection to the proposal:

The current and proposed future use of Montefiore has been confirmed as Residential and therefore Residential Zoning rules should

apply.

The proposed building heights are excessive, the design is too bulky and does not reflect the local character of the current neighbourhood and contravenes the current residential zoning rules which should apply.

The principle of consistency with neighbourhood amenity and streetscapes has been grossly violated in this proposal and subsequently issues of significantly increased traffic, local noise issues, disturbance of local residents, pedestrian safety risks, loss of visual and acoustic privacy for neighbours and parking issues have not been addressed in a transparent and honest way evidenced by the fact that Community Consultation has been very inadequate and only been a superficial and a token effort.

The proposal is grossly inadequate by not providing a Master Plan that clearly and accurately shows the exact location of the buildings, their functions and their heights and bulk.

In summary, the proposal for Montefiore Seniors housing should reflect that housing for seniors is not dissimilar to housing for other residents and should therefore follow the rules of residential zoning, be moderately sized(medium density), be consistent with the local character, neighbourhood amenity and local streetscapes.

The current proposal violates these principles and I therefore strongly object to the proposal.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Suburb/ Town

Hunters Hill

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submission

Submission on Planning Proposal PP-2023-1109

I live in Hunters Hill near the proposed Montefiore site and I object to Planning Proposal PP-2023-1109.

This proposal seeks to change planning controls to allow buildings that are far larger and taller than what is currently permitted in this low-density residential area. Allowing buildings of this scale, including heights of up to around 24 metres, is not appropriate for the surrounding neighbourhood and would significantly alter its character.

Local streets around the site are narrow and already difficult to use due to on-street parking and limited passing space. From daily experience, congestion and access issues already exist. A development of this size would increase traffic from residents, staff, visitors, servicing and deliveries, placing further pressure on roads that are not designed to accommodate this level of intensity. I am not confident that traffic studies reflect real local conditions.

The bulk and mass of the proposed buildings would also result in loss of privacy and reduced sunlight for surrounding homes, particularly during winter months. Buildings of this size would be visually intrusive and dominate nearby properties, which is inconsistent with the established built form of the area.

Construction impacts have not been adequately addressed. Prolonged construction would significantly affect local residents through noise, dust, loss of parking, restricted access and safety risks on already constrained streets.

There is also insufficient consideration of broader infrastructure impacts, including stormwater, waste collection, emergency vehicle access and local services. Increasing density without clearly identified and funded upgrades risks ongoing problems for the neighbourhood.

I am further concerned about the impact on local wildlife and vegetation. Hunters Hill contains established tree cover and habitat that supports native birds and other wildlife. Large-scale development and associated construction would result in habitat loss and disturbance that cannot easily be reversed.

Finally, this is a site-specific rezoning rather than part of a coordinated plan for Hunters Hill. If approved, it would set a precedent for similar large-scale developments in other low-density areas, gradually increasing density and infrastructure pressure without proper strategic planning.

For these reasons, I do not believe this proposal is suitable for its location and I ask that the planning panel not support Planning Proposal PP-2023-1109.

Submission Type

I am making a personal submission

Title

Mr

First Name

Cruze

Family name

Saurabh

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunterhill

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submission

We do not want multi-dwelling in our area; it's such a nice place to live, and this will just ruin the vibe. We have called this area our home, and we have been proud owners living in Huntershill for the last 30 years. My wife and I do not want these apartments.

Submission Type

I am making a personal submission

Title

Mr

First Name

Paul

Family name

Gifford

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

Document attached

Montefiore Seniors Living Proposal (PP-2023-1109)
Submission by Paul and Rosemarie Gifford

We are deeply concerned about the scale of the Planning Proposal put forward for the redevelopment of the western section of the Montefiore site in Hunters Hill and its adverse impact on the amenity and natural beauty of our local bushland and Lane Cove River area.

Our points of objection and concerns to the Planning Proposal are:

1. **Rezoning**
    a. We strongly argue against the rezoning of the Montefiore site from R2 low density to SP2 Infrastructure (Seniors Housing) to allow increased density and height of the proposed buildings.
    b. The current height restrictions of 2 storey buildings in this area of Hunters Hill should remain in force. Any redevelopment of the Montefiore site should be restricted to the current R2 zoning.

2. **Height of some of the Proposed Buildings**
    a. The proposed 4 storey developments along Barons Crescent, namely Buildings A and B are not suited to the current street scape of Barons Crescent. The building heights of these two buildings should be restricted to 8.5 metres, not the proposed 18 metres.
    b. Building A is directly opposite our house. Building A at 4 stories would directly impact the privacy and pleasant street scape at the intersection of Barons Crescent and Gaza Avenue.
    c. The Planning Proposal shows three 2 storey buildings along Gaza Avenue. Therefore it does not seem logical to suggest a 4 storey building at the end of Gaza Avenue where it intersects with Barons Crescent.
    d. In the latest Planning Proposal the two central towers have been moved further south to accommodate the Regional Fire Services requirements. However we would restate that all buildings should not exceed 2 stories to maintain the natural beauty of the area.

3. **Increase in Vehicular Traffic especially on Barons Crescent**
    a. Barons Crescent is a narrow winding street not suited to increase motor car or delivery truck movements. Barons Crescent has three major bends which makes truck movements difficult and dangerous.
    b. High Street runs parallel to Barons Crescent. High Street is a wide straight street more suited to higher volumes of vehicular traffic.
    c. Currently the main entrance to the Montefiore site is in High Street. Delivery trucks and some pedestrian staff use an entrance in Barons Crescent adjacent to the Synagogue. To facilitate the increases in vehicular traffic from the proposed

redevelopment The Panning Proposal should show all vehicles entering and exiting the site from High Street.

4. **Loss of Currently Available Street Parking**
    a. Currently local residents and their visitors can easily park in Gaza Avenue and Barons Crescent
    b. This is despite some Montefiore staff parking in these streets and accessing the site through the rear entrance as there is insufficient parking on the site.
    c. Any excessive redevelopment of the site will require extra staff who will park in their cars in Barpns Crescent and Gaza Avenue which will reduce the street parking availability for local residents.

5. **Proposed Increase in Pedestrian Access Points to the Site from Gaza Avenue and Barons Crescents**
    a. The Planning proposal shows new multiple pedestrian access points to the site in Barons Crescent and Gaza Avenue.
    b. Currently there is only one pedestrian access point in Barons Crescent which is adjacent to the existing delivery truck driveway.
    c. These additional pedestrian access points will encourage staff and visitors to the site to park in Barons Crescent and Gaza Avenue and reduce the availability of street parking for local residents.
    d. There should not be any additional pedestrian access points included in the Planning Proposal. These additional pedestrian access points will also reduce the security of the Montefiore site.

Yours sincerely

Paul Gifford (signed)

Rosemarie Gifford (signed)

21 January 2026
56 Barons Crescent
Hunters Hill NSW 2110

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

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submission

This submission formally objects to Planning Proposal PP-2023-1109 (Montefiore Seniors Living). The attached submission, prepared by StudioBNH pty ltd on behalf of a concerned resident and property owner in close proximity to the site, identifies fundamental concerns regarding: (1) bushfire risk and APZ non-compliance under Planning for Bush Fire Protection 2019, including RFS confirmation that the site must be assessed as a greenfield SFPP development with no applicable concessions; (2) adverse impacts on heritage item I472, “Garden – Montefiore Home,” with critical heritage assessment improperly deferred to the DA stage; and (3) the proposed 100% increase in FSR along the Gaza Avenue frontage (from 0.5:1 to 1:1), which is inconsistent with the objectives of the Hunters Hill LEP 2012 and the established low-density residential character of the area.

For the reasons set out in the attached submission, we respectfully request that the Panel do not support the Proposal in its current form or require substantial amendment prior to any further consideration.

ABN: 68 674 850 858

Date: 23 January 2026

To: Planning Proposal Authority, Sydney North Planning Panel, NSW Department of Planning, Housing and Infrastructure

(submission Via NSW Planning Portal)

Re: Submission Objecting to Planning Proposal PP-2023-1109 – Montefiore Seniors Living Proposal

Dear Panel Members,

StudioBNH has prepared this submission on behalf of a concerned resident and property owner located in close proximity to the Montefiore site at the corner of Gaza Avenue and Barons Crescent, Hunters Hill.

This submission formally objects to Planning Proposal PP-2023-1109 on the basis that it raises fundamental concerns regarding heritage conservation, inappropriate development intensity (FSR and height controls), bushfire risk and APZ non-compliances, and adverse impacts on surrounding residential amenity and the integrity of the *Hunters Hill LEP 2012*.

These matters go to the strategic suitability of the site and the appropriateness of embedding permanent statutory controls in advance of demonstrated compliance with heritage, bushfire, and planning objectives.

For the reasons set out in the attached submission, we respectfully request that the Panel do not support the Proposal in its current form, and require that it be refused or substantially amended prior to further consideration.

Yours faithfully,

[redacted]

nominated architect
NSW ARB No.8090

studioBNH pty ltd

[redacted]

SUBMISSION

OBJECTING TO PLANNING PROPOSAL PP-2023-1109

Montefiore Seniors Living Proposal

116-120 High Street, 2-20 Gaza Avenue and 4 Barons Crescent, Hunters Hill

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Prepared by: ***StudioBNH*** **pty ltd**

On behalf of a concerned resident/property owner in close proximity to the site

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23 January 2026

BUSHFIRE RISK AND RFS REQUIREMENTS

Overview

The site adjoins Boronia Park, which contains bushland classified as Woodland and Sydney Coastal Dry Sclerophyll Forest vegetation under *Planning for Bush Fire Protection 2019 (PBP 2019).* The Proposal, being seniors housing accommodating elderly and potentially mobility-impaired residents, is classified as a *Special Fire Protection Purpose (SFPP) development under section 100B(6)(f) of the Rural Fires Act 1997.* This classification attracts the most stringent bushfire protection requirements under NSW planning legislation.
The RFS correspondence exhibited with this planning proposal identifies unresolved, site-wide bushfire risks that must be addressed before any rezoning can be supported.

Objection Grounds

1. Asset Protection Zone (APZ) Non-Compliance

The exhibited response from RFS states the following:

- *'The proposal as a rezoning from R2 low density residential zone to SP2 Infrastructure (Seniors Housing) is required to demonstrate that the land is capable of complying with Section 4 Strategic Planning and 6 Special Fire Protection Purpose Developments of* Planning *for Bush Fire Protection 2019. The rezoning needs to demonstrate compliance with the setbacks for a new Special Fire Protection Purpose development as the existing use under Section 6.4 Development of existing SFPP facilities of Planning for Bush Fire Protection is not a consideration for a rezoning'*

- *'The rezoning to SP2 Infrastructure (Seniors Housing) looks at the site as a greenfield development and requires that the setbacks be demonstrated excluding areas that are affected by greater than 10kW/m2 measured at 1200 Kelvin'*

- *'While the RFS Next Generation Bushfire Risk Management Plans (BFRMP) are important strategic documents, the focus of these plans is to provide landscape scale information for local Bush Fire Management Committees to support triage and prioritisation strategies to minimise and mitigate bush fire risk….The RFS believes…. the BFRMP, should not be used as the justification for concessions to bushfire protection measures'*

The exhibited Blackash assessment identifies systemic APZ shortfalls on all hazard aspects. In multiple locations, the modelled APZs fall well below the Acceptable Solutions in PBP 2019.

APZs are a fundamental land-use constraint, not a matter to be resolved at development application stage. At rezoning, the Proposal must demonstrate that compliant APZs can be achieved and maintained within the site in perpetuity. Instead, the proposal relies on future modelling, performance-based solutions, and design refinement, none of which provide certainty that SFPP standards can be met.

Proceeding in the absence of demonstrable APZ compliance would overstate the site's development capacity and defer resolution of a fundamental life-safety issue. This approach is inconsistent with PBP 2019 and the *Rural Fires Act 1997*.

2. Evacuation and Life Safety Deficiencies

The proposal fails to demonstrate that residents, emergency responders, or the surrounding community can be safely protected during a bushfire event.

The Blackash assessment identifies bushland pinch points where fire may cross roads, temporarily restricting access and compromising evacuation and emergency service entry. The Proposal does not demonstrate that evacuation routes will remain viable under worst-case conditions or that sufficient redundancy exists if access is lost.

These risks are critical given the vulnerable population proposed, including residents with limited mobility, cognitive impairment, and medical dependence. The evacuation strategy does not show how timely and safe relocation would occur if access is constrained or emergency services cannot reach the site.

The proposal relies on shelter-in-place as a primary risk management measure. While the RFS has conditionally acknowledged this approach, it is expressly contingent on full APZ and setback compliance under PBP 2019. Shelter-in-place does not resolve APZ shortfalls, constrained access, or site-wide exposure to radiant heat, and assumes uninterrupted building performance, power supply, and mechanical systems under extreme conditions.

Shelter-in-place is a last-resort life-safety measure, not a planning justification for increased density or floor space ratio. Using refuge in place of compliant APZs and safe access pathways increases residual risk to residents and the broader community.

3. SFPP Standards Not Achieved

As an SFPP development, the Proposal must demonstrate compliance with PBP 2019, including:

- APZs limiting radiant heat exposure to no more than 10 kW/m² at any part of a building
- Safe and reliable access and egress
- Compliant emergency management and shelter-in-place facilities
- Adequate water supply and firefighting access

The RFS has confirmed that the site must be assessed as a new SFPP development, not as an extension or continuation of the existing facility. Despite this, the proposal:

- Exceeds radiant heat limits on Building B
- Fails to achieve compliant APZs on all hazard aspects
- Relies heavily on untested, deferred performance-based solutions

These outcomes demonstrate that the Proposal cannot currently meet the mandatory bushfire protection standards required for SFPP rezoning.

4. Site Unsuitability Under PBP 2019

PBP 2019 identifies development as inappropriate where land is:

- Exposed to high bushfire risk
- Difficult or unsafe to evacuate
- Constrained by environmental factors that cannot be mitigated
- Likely to increase risk to surrounding development

The Proposal meets multiple exclusion criteria:

- **Evacuation viability:** The RFS confirms fire can reach the site within one hour, limiting or preventing safe evacuation.
- **Density impacts:** The increase from 18 to 144 units significantly intensifies evacuation demand on already constrained access routes.
- **Risk to neighbours:** The Blackash report identifies that emergency access routes may be blocked during fire passage, increasing risk to surrounding properties.
- **Environmental constraints:** The site directly adjoins Category 1 Bushfire Prone Land and cannot achieve compliant APZs on all hazard aspects.

These constraints indicate that the site cannot safely accommodate the proposed development yield.

5. Summary

The RFS correspondence and exhibited supporting material demonstrate that this site cannot safely support a *Special Fire Protection Purpose (SFPP*) rezoning in its current form.

The proposal does not achieve compliant APZs, fails to demonstrate safe and reliable evacuation, lacks sufficient detail to substantiate a shelter-in-place strategy under worst-case bushfire conditions, and relies on performance-based solutions explicitly rejected by the RFS at the rezoning stage.

The eightfold increase in residential density further exacerbates evacuation risk and access constraints in an area subject to rapid fire arrival times.

Accordingly, the rezoning should not proceed unless it can demonstrably:

- Achieve compliant APZs across all hazard aspects
- Provide safe, reliable evacuation or fully compliant refuge arrangements
- Limit development density to a level that does not increase risk to residents, emergency responders, or the surrounding community

These deficiencies demonstrate that the site is inherently constrained by bushfire risk, access limitations, and environmental conditions that cannot be mitigated within the proposed development yield. Support for the Proposal in its current form would be inconsistent with *Planning for Bush Fire Protection 2019* and the *Rural Fires Act 1997* and would overstate the site's safe development capacity.

HERITAGE IMPACTS

Overview

The Montefiore Hunters Hill campus is listed as Local heritage item ***"Garden – Montefiore Home"*** *(Item I472) under Schedule 5 of Hunters Hill LEP 2012.* The name of the listing is significant: the heritage value resides in '*the garden and its setting'*.

The heritage curtilage encompasses the main campus. The Gaza Avenue frontage, comprising 10 separate residential lots currently zoned R2, lies outside the curtilage but adjoins the heritage item and forms a critical part of its setting.

The garden's heritage significance derive from its Gardenesque landscape tradition, including early tree plantings (Cook Island Pine, Monterey Pine), mature specimen trees, the historic driveway layout, turning circle, and fountain. The exhibited Heritage Assessment acknowledges that under the Burra Charter, any works or new development *"should not adversely impact on the significance of the place*" and "*should promote and facilitate the conservation of significance.".*

The Proposal is fundamentally inconsistent with these principles. Within the heritage curtilage, it seeks to enable buildings up to 24 metres (six storeys), involving extensive tree removal, basement construction within critical root zones, and increased overshadowing of the heritage garden. Within the heritage setting, it proposes increasing the FSR from 0.5:1 to 1:1 along the Gaza Avenue frontage, enabling a scale and intensity of development that would fundamentally alter the context in which the heritage garden is experienced.

Both the heritage item and its setting warrant protection. The Proposal would materially compromise both.

Objection Grounds

1. Inconsistency with Established Heritage Principles

The exhibited Heritage Assessment states that future development *"should not adversely impact on the significance of the place"* and must *"mitigate the impact of mass and overshadowing of the garden."* The Proposal contradicts these principles.

Within the heritage curtilage:

The Proposal would increase building heights from 8.5 metres to up to 24 metres (six storeys) in the central precinct and to 18 metres (four storeys) along Barons Crescent—representing up to a threefold increase over existing controls. This scale of development would dominate the heritage landscape, materially increase overshadowing, and necessitate substantial tree removal and basement excavation within established root zones.

Within the heritage setting:

Although the Gaza Avenue frontage lies outside the formal curtilage, it directly adjoins the heritage item and forms an integral part of its setting. Under the Burra Charter, the protection of setting is essential, as development that erodes the context in which a heritage place is experienced diminishes its cultural significance. Increasing the FSR from 0.5:1 to 1:1 would

convert the western edge of the site from a low-density residential interface into a medium-density built form, fundamentally altering the garden's spatial, visual, and landscape context.

Taken together, these changes are incompatible with the heritage significance of Item I472 and demonstrate that the Proposal is inappropriate in this location.

2. Inadequate Heritage Assessments & Improper Deferral to DA Stage

While the Proposal is supported by landscape analysis and an arborist report, the exhibited Heritage Assessment itself explicitly acknowledges that these materials are insufficient to properly resolve heritage impacts. It recommends that substantial additional work be undertaken at the Development Application (DA) stage, including:

- A detailed Heritage Impact Assessment to accompany any DA
- A detailed Landscape Plan to augment the landscaped setting of the Montefiore Garden
- Comprehensive mapping of significant trees by an arborist experienced in heritage landscapes
- Further detailed design resolution of Building D to ensure satisfactory solar access to the heritage garden

Despite these acknowledged deficiencies, the community is being asked to support permanent amendments to the LEP. Once embedded, height limits of 24 metres and an FSR of 1:1 become statutory development entitlements that will persist regardless of any future heritage findings.

Proper planning practice requires heritage constraints to inform and shape development standards at the strategic planning stage—not to be deferred until after those standards are locked in. In the absence of clear, demonstrated evidence that the Proposal will result in minimal impacts on the heritage significance, curtilage, and setting of the site, the Proposal cannot be supported.

4. Significant Tree Removal Undermines Heritage Conservation

The exhibited supporting material indicates extensive tree loss that directly contradicts claims of heritage conservation.

- **Scale of removal:** Of 398 trees on site, the arborist anticipates removal of "*most*" low-value trees (214 trees, 54% of population) "*to facilitate the development*."

- **Heritage trees at risk:** Urbis identifies the Monterey Pines as heritage-significant elements of the 1939 garden, however, the arborist proposes their replacement with "*a more suitable species*," undermining the authenticity and integrity of the historic landscape.

- **Construction impacts:** The OCULUS Site Analysis identifies multiple moderate and high-value trees with Tree Protection Zone incursions exceeding acceptable thresholds, including Liquidambar (two locations), London Plane, Mexican Weeping Pine, Lemon Scented Gum (high value – impacted by basement), and Monterey Pine (impacted by café construction).

- **The arborist's warning:** The arborist notes that "*larger and older trees typically have much lower tolerance to construction-related impacts*." These are precisely the mature, heritage-significant trees that define the character and significance of the garden.

The extent of proposed tree removal and construction impacts demonstrates that the Proposal prioritises development yield over the conservation of the heritage landscape, fundamentally undermining the heritage values it claims to protect.

5. Summary

The Proposal should not be supported on heritage grounds for the following reasons:

- The proposed controls (24m heights, 1:1 FSR) have not been demonstrated to be compatible with the conservation of Item I472 "Garden – Montefiore Home"
- Critical heritage analysis have been improperly deferred to DA stage, after statutory planning controls would already be embedded
- The Gaza Avenue approach is untenable – the Proposal seeks to claim heritage benefits while dismissing the heritage constraints of the site's setting
- Anticipated removal of 200+ trees, including the replacement of heritage-significant Monterey Pines contradict heritage conservation principles
- The exhibited arborist's assessment confirms heritage-significant older trees are most vulnerable to construction impacts and are least able to tolerate the basement and construction impacts proposed

The Proposal seeks to establish permanent LEP provisions that would permit up to six-storey development surrounding a heritage garden, relying on assurances that heritage impacts can be "managed at the DA stage.". This approach inverts the proper planning hierarchy. Heritage significance and constraints must inform and define development standards from the outset, not be retrospectively applied to justify them.

Accordingly, the Proposal should be refused or substantially amended to ensure the heritage significance, curtilage and setting of the Montefiore Garden are appropriately conserved.

FLOOR SPACE RATIO - GAZA AVENUE FRONTAGE

Overview

The Planning Proposal seeks to *"consolidate the FSR control for the properties along Gaza Avenue so that whole site has an FSR of 1:1",* which represents a 100% increase over the existing 0.5:1 control.

This section addresses the proposed FSR increase along the Gaza Avenue frontage, where ten existing dwelling houses are proposed to be demolished and replaced with new development facilitated by the increased controls.

The submitter/resident's property is located approximately 30 metres from the site boundary at the corner of Gaza Avenue and Barons Crescent and will be impacted by any intensification of development along this frontage. The submitter/resident also raises concerns regarding the broader impacts on neighbourhood amenity and the integrity of the Hunters Hill planning framework.

Objection Grounds

1. Inconsistency with Hunters Hill LEP 2012 Objectives

Clause 4.4(1) of Hunters Hill LEP 2012 establishes objectives for FSR control. The proposed 1:1 FSR is inconsistent with these objectives:

- **Objective (a):** ***"to specify limits for the size of development that would be compatible with the character and potential of particular locations"***

  The existing 0.5:1 FSR is deliberately calibrated to preserve the low-density 'garden suburb' character of Hunters Hill. Increasing this to 1:1 would enable development at a scale fundamentally inconsistent with the established character of Gaza Avenue and the surrounding Boronia Park precinct.

  All adjoining R2-zoned land along Gaza Avenue, Barons Crescent and within the wider Boronia Park precinct are subject to a 0.5:1 FSR. Introducing a 1:1 FSR at this interface would create an abrupt and incongruous transition, undermining the coherent low-density character the LEP is intended to maintain.

- **Objective (b): "*to manage the density and intensity of multi-unit residential development according to the purpose of each residential zone"***

  The proposed FSR is more than double the standard R2 control and approaches levels typically seen in R3 Medium Density or R4 High Density zones. Its application along a low-density residential interface is inconsistent with the intended function of the R2 zone.

- **Objective (c): "*to encourage buildings that maximise the proportion of site area that may be retained as landscaped area*"**

An FSR of 1:1 would enable larger building footprints and increased site coverage, significantly reducing landscaped areas that are fundamental to Hunters Hill's garden suburb character. This outcome directly conflicts with both the objectives of Clause 4.4 and the established planning intent for the locality.

2. Inconsistency with Height Objectives - The FSR/Height Planning "Loophole"

Clause 4.3(1) of the LEP includes the objective:

"to maintain the character and identity of Hunters Hill by limiting the scale of buildings to a maximum of two storeys in the low-density residential zone, heritage conservation areas and foreshore areas"

The Proposal indicates that the Gaza Avenue frontage will retain its 8.5m height limit (approximately 2 storeys). However, the combination of 1:1 FSR with 8.5m height creates a fundamental inconsistency:

- To achieve an FSR of 1:1 within an 8.5m height envelope would require site coverage approaching or exceeding 50% resulting in:
  - Buildings built to all boundaries
  - Minimal landscaped and deep soil areas
  - Excessive visual bulk when viewed from neighbouring properties
- Alternatively - and more likely - the 1:1 FSR control creates a "latent" development entitlement that cannot be realised within the 8.5m height limit, forming the basis for future clause 4.6 variation requests to increase building height on the grounds that the "intended" development density cannot otherwise be achieved.
- Once embedded in the LEP, a 1:1 FSR would therefore operate as a structural justification for future height increases, effectively undermining the two-storey objective for Gaza Avenue.

This concern was correctly identified by Council in its September 2023 refusal, noting that any site-specific DCP controls would not apply if the development were to become State Significant Development.

3. Failure to Satisfy SP2 Zone Objectives

The SP2 zone objective requires development that "*minimises any adverse impacts on surrounding land*.". The proposal, including the increase in FSR along Gaza Avenue contradicts this — it maximises development capacity immediately adjacent to the R2 neighbourhood. The likely impacts include:

- Increased building bulk and visual dominance when viewed from surrounding properties
- Overlooking and privacy loss, with additional habitable floor space creating direct sightlines into rear yards along Barons Crescent and Gaza Avenue

- Traffic intensification — with an increase from approximately 18 dwellings to 144 independent living units generating significantly higher vehicle movements through residential streets
- Increased noise and activity associated with institutional-scale use adjoining low-density housing
- An abrupt and unmitigated interface, transitioning directly from a 1:1 FSR site to 0.5:1 residential land

Collectively, these impacts demonstrate that the Proposal would impose, rather than minimise, adverse effects on surrounding land. It therefore fails to satisfy the fundamental objectives of the SP2 zone.

4. Precedent and Planning Integrity

Hunters Hill Council has previously identified that rezoning this land to SP2 Infrastructure would set an undesirable precedent. That concern applies equally to the proposed FSR uplift.

Approval of a 1:1 FSR along the Gaza Avenue frontage would establish a precedent whereby:

- FSR controls can be selectively increased on land immediately adjoining established low-density residential areas
- The 0.5:1 FSR standard underpinning Hunters Hill's planning framework can be set aside through site-specific proposals
- Institutional landowners can secure higher development intensities at residential interfaces than those available to neighbouring residents

Such an outcome would erode certainty, consistency, and equity in the application of planning controls and place pressure on other interface sites to seek similar uplifts, undermining the integrity of the LEP.

5. Direct Impacts on Adjoining & Neighbouring Properties

The submitter/resident's property, located within 30 metres of the site boundary, at the corner of Gaza Avenue and Barons Crescent, will be directly affected by the proposed FSR increase and indirectly impacted by the broader proposal.

The exhibited site cross-sections demonstrate that 4-storey buildings (18m) along the Gaza Ave frontage would have clear sight lines into the rear yards of properties along Barons Crescent, including the submitter/resident's property. This represents a fundamental change to the existing privacy conditions, where rear yards are currently screened by low-density built form.

The uplift from 18 to 144 independent living units—an increase of approximately 700%—will generate substantially higher traffic volumes through the local street network, affecting residents throughout the precinct.

The increased building scale, site coverage, and activity levels would fundamentally alter the established low-density character of the precinct, eroding the garden suburb character that defines Hunters Hill.

The submitter/resident purchased in this location with a reasonable expectation that the planning controls protecting that character would be maintained. The proposed FSR increase undermines that expectation and the integrity of the planning framework.

6. Heritage Setting Impacts

The Gaza Avenue frontage adjoins heritage item I472 "Garden – Montefiore Home" and forms part of its setting.

As detailed in the Heritage Impacts section of this submission, the proposed FSR increase would transform the western edge of the heritage setting from a low-density residential interface to medium-density built form, diminishing the heritage significance of the place. The Burra Charter requires that the setting of a heritage item be protected, and intensive development at the boundary contradicts this principle.

7. Summary

The proposed FSR increase along Gaza Avenue frontage should not be supported on the following grounds:

- It is inconsistent with the objectives of *clause 4.4 (FSR), clause 4.3 (Height*), and the R2 zone in *Hunters Hill LEP 2012*
- It fails to satisfy the SP2 zone objective to minimise adverse impacts on surrounding land
- It creates a structural planning loophole that facilitates future height variations
- It sets an unacceptable precedent for selective FSR uplifts in low-density residential interfaces
- It is incompatible with the heritage setting of Item I472, “Garden – Montefiore Home”
- Reinforced by Bushfire/APZ Non-Compliances:
- Will directly and adversely impact the amenity of adjoining properties, including the submitter/resident’s property located within 30m of the site

The proposed FSR uplift enables a development intensity that the site and its surrounding low-density neighbourhood cannot reasonably or safely accommodate. The existing 0.5:1 FSR should be retained for the Gaza Avenue frontage.

CONCLUSION

Summary of Objection Grounds

This submission has demonstrated that Planning Proposal PP-2023-1109 should not proceed in its current form. The proposal fails on multiple fundamental and unresolved grounds:-

Bushfire Risk

The site cannot safely accommodate a *Special Fire Protection Purpose* development at the proposed density. The *NSW Rural Fire Service* has confirmed that evacuation may not be viable due to rapid fire arrival times, that the site must be assessed as a greenfield SFPP development with no concessions, and that compliant Asset Protection Zones have not been satisfactorily demonstrated. Reliance on a shelter-in-place strategy does not resolve these fundamental compliance deficiencies and cannot be relied upon to justify increased development yield for a vulnerable population.

FSR and Development Intensity

The proposed 100% increase in FSR from 0.5:1 to 1:1 along Gaza Avenue is inconsistent with the objectives of *Hunters Hill LEP 2012* and contradicts the established low-density garden suburb character. Such an intensity would be unprecedented at a residential interface in Hunters Hill, establishing a planning framework that will inevitably enable future height and bulk variations, to the detriment of the neighbourhood.

Heritage Conservation

The Proposal fails to adequately demonstrate measures that are compatible with conserving the heritage significance of *Item I472 "Garden – Montefiore Home."*. Critical heritage assessments have been improperly deferred to DA stage, after LEP controls would be permanently embedded. The anticipated removal of over 200 trees, including heritage-significant specimens, contradicts the heritage conservation outcomes the Proposal claims to achieve. Many of these trees are unlikely to survive construction, particularly works associated with a basement carpark, placing the heritage character of the site at serious risk.

Direct Amenity Impacts

The submitter/resident's property, located within 30 metres of the site at the corner of Gaza Avenue and Barons Crescent, will be directly affected by overlooking from elevated buildings (over 2-storeys) and the fundamental transformation of the precinct's low-density character. These impacts are a direct consequence of the proposed development controls and cannot be adequately mitigated at the DA stage.

Inconsistency with Council's Position

Hunters Hill Council unanimously rejected this proposal in September 2023 on 13 grounds. The Council found that building heights are excessive and out of character, the unprecedented SP2 rezoning sets a serious precedent, and the proposal fails the LEP requirement that "*Neighbourhoods Reflect Local Character*." These concerns remain unresolved.

For the reasons outlined in this submission, we respectfully recommend that the Panel:

1. Refuse the Planning Proposal in its current form on the grounds that the site cannot safely accommodate the proposed development intensity within demonstrated bushfire, heritage and environmental constraints; or

2. If the Panel is minded to allow the proposal to proceed, require substantial amendments including:

    - Reduction of building heights to levels demonstrated to be compatible with heritage conservation, bushfire compliance, and neighbouing privacy.
    - Retention of the existing 0.5:1 FSR for all land fronting Gaza Avenue.
    - Demonstrated APZ compliance for all hazard aspects and proposed building envelopes prior to LEP amendment.
    - Completion of all deferred heritage, landscape and bushfire assessments with findings fully incorporated into the Proposal.

The Proposal, in its current form, overstates the site's safe and appropriate development capacity and would establish an unacceptable precedent for Hunters Hill. In the absence of detailed site assessments and demonstrable compliance measures, the submitter/resident and the affected community should not be expected to endorse permanent LEP amendments based on assurances that fundamental constraints will be "managed at DA stage".

The Panel is urged to give decisive weight to public safety, heritage conservation, environmental protection, the character of the neighbourhood, and the protection of amenity and privacy for all affected residents in its decision.

Submission Type

I am making a personal submission

Title

Ms

First Name

Mary

Family name

Flannery

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

It is acknowledged that additional aged care facilities address a growing community need. In order to achieve an outcome that will result in ongoing community harmony, important safeguards and provisions are required to deliver positives outcomes for those who require care, their families who may visit frequently and the entire local community, as follows: 1. any change to zoning rules must apply only to the current Montefiore land and aged care facilities (for the purposes of aged care only) and must explicitly rule out bordering streets from a changed zoning. 2. On site parking, shuttle buses, bicycle friendly paths and public transport must be included in occupation certificate requirements to ensure there is sufficient parking on site for all staff members. 3. There must be no reliance on local urban street for staff parking. 4. there is no acceptable rationale for increasing building height limits to 16/18m at the

intersection of Gaza and Barons Cres (shown as O2and P2 on the plan). It is out of step with the remainder of the perimeter buildings and out of step with the residential dwellings on Gaza and on Hunters Hill. Is does not present any aesthetic appeal or quality addition in the current proposal and without any justification is an unacceptable imposition on local neighbours 5. Safety at that Gaza/Barons Cres intersection (and the Gaz/High St intersection) is already unacceptable for vehicles due to limited visibility. If there is to be development adjacent to either intersections the opportunity should be used to move buildings further back from the intersections and perimeter to open up visibility for trucks/buses/cars/bikes and pedestrians and definitely not to add more imposing building to those intersections. At present , there is no capacity for additional traffic on Barons Crescent and even with current levels additional provisions are required to accommodate buses, delivery trucks, elderly pedestrians, motorised wheelchairs and the frequent passage of emergency vehicles. This is not a zone that can accommodate more parked cars without further escalating safety risks.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Email

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Suburb/ Town

Hunters hill

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submission

I am a local Hunters Hill resident living a short distance from the proposed site. I am a local Hunters Hill resident living a short distance from the proposed site. Living on a narrow street, I share the same day-to-day frustrations as many residents across Hunters Hill with traffic, parking and access.

My objection relates to the proposed rezoning and the precedent it would set for increased scale and intensity, and whether any

practical benefit to the Hunters Hill community has been shown given the long-term pressure on infrastructure, services and resident's daily life.

My objections are as follows

• The proposal does not make it clear how the people who already live in Hunters Hill would benefit in practical, day-to-day terms from development at this scale.
• Sacrificing aged care beds to add more independent living units does not make sense when the local ageing population is only going to increase.
• The benefits outlined in the proposal appear to benefit future residents and the applicant, while the consequences of increased activity, traffic and infrastructure pressure would be felt across the wider Hunters Hill area.
• Traffic, parking and access issues are already experienced across the suburb, not just near the site, and additional development at this scale would add to these pressures across the wider road network.
• Approval of the rezoning would set a precedent for increased scale and intensity in low density residential areas across Hunters Hill, compounding pressure on infrastructure and everyday liveability over time.
• Uncertainty of what comes next. It is not clear how the impacts created by this rezoning would be managed in practice if it goes ahead. Does it set precedent for future developments across Hunters Hill for similar land holders.

As a resident who intends to stay in Hunters Hill , I feel that at some point the growing congestion and pressure on local streets needs to be acknowledged rather than added to. It feels as though Hunters Hill is repeatedly being asked to absorb more development without a clear plan for how traffic, parking and access issues will improve.

I respectfully ask that a more considered and practical approach be taken, one that recognises the limits of the existing road network and avoids decisions that will further worsen congestion and daily frustration for residents in the years ahead.

Submission Type

I am making a personal submission

Title

Mr

First Name

Enrico

Family name

Mustillo

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

Please see submission attached

To the Planning Department,

Please accept this formal submission regarding the proposed rezoning of the aforementioned site from R2 Low Density Residential to SP2 Infrastructure (Seniors Housing), including the requested increases to maximum building height and Floor Space Ratio (FSR).

As a resident of the local area, I wish to formally record my strong objection to these changes. While the need for seniors' housing is acknowledged, the scale and intensity of the proposed development are fundamentally incompatible with the existing character and infrastructure of our neighborhood.

1. Erosion of Neighborhood Character

The primary concern is the **loss of the "Low Density" feel** that defines an R2 zone. Transitioning to an SP2 designation with increased height and FSR creates a visual and structural mismatch.

- **Visual Dominance:** Increasing the maximum building height will result in structures that tower over existing single-story or modest two-story dwellings. This "looming" effect disrupts the established skyline.
- **Overdevelopment:** A higher FSR means more building mass and less open "green space." This can lead to a "concrete jungle" effect, reducing the backyard canopy and permeable surfaces that are characteristic of R2 zones.

2. Privacy and Amenity Impacts

The intensification of the site directly affects the quality of life for immediate neighbors.

- **Overshadowing:** Taller buildings inevitably cast longer shadows. This can significantly reduce solar access to neighboring gardens, solar panels, and living areas, particularly during winter.
- **Loss of Privacy:** Higher-density seniors' housing often involves balconies and multi-story windows that overlook the private open spaces of existing low-density homes.
- **Acoustic Privacy:** Increased density brings increased noise—not just from residents, but from the mechanical plant equipment (AC units, elevators) required for larger facilities.

3. Traffic and Infrastructure Strain

The proposal to increase traffic in a residential area designed for low-volume flow is a major safety and logistical concern.

Impact Category	Specific Concern
Congestion	Seniors' housing generates significant "hidden" traffic: staff shifts, medical deliveries, waste collection, and visitor parking.
Safety	Increased vehicle movements on narrow R2-style streets pose a risk to pedestrians, particularly children and local pets.
Parking Overflow	If the SP2 development does not provide ample on-site parking, staff and visitors will spill out into the surrounding streets, competing with residents.

4. Environmental and Drainage Concerns

Replacing soil and gardens with a larger building footprint (increased FSR) has physical consequences for the local ecosystem.

- **Urban Heat Island Effect:** More hard surfaces and less vegetation lead to localized temperature increases.
- **Stormwater Runoff:** Higher FSR reduces the land's natural ability to absorb rainwater. In heavy rain events, this can lead to increased runoff, potentially overwhelming local gutter systems and impacting downstream properties.

We urge the Council to maintain the integrity of the current Local Environmental Plan (LEP) and protect the residential amenity that makes this area a cohesive community. We request that the application be refused in its current form or significantly amended to align with the existing R2 height and density controls.

I look forward to being kept informed of the progress of this application and any upcoming public hearings.

Sincerely,

Enrico Mustillo

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

I work in the health industry and I know Australia does not need more seniors living - but we do need a lot more aged care beds for our ageing, infirm citizens. This situation is only going to worsen. Montefiore's planning proposal will result in a reduction of aged care beds. This is wrong.
Montefiore's current planning proposal is too large for this neighbourhood and will result in an increase in motor vehicles in our narrow streets. It will impact our quiet, pleasant neighbourhood.
The proposed height of the buildings will over shadow the surrounding neighbourhood making houses feel "towered" over and shadowed. This over shadowing will reduce the sun to our solar panels, gardens and living areas - particularly in winter.

Less green areas and increased concrete will affect stormwater runoff - a major consideration as we have the Lane Cove River on our door step

Case details

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

HUNTERS HILL, 2110, NSW

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No

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submission

Montefiore Building Proposal
I submit an objection to the Montefiore Building Proposal based on the following points
• Building heights of four and six stories are completely out of proportion to a residential area.
• Traffic management plan was measured during COVID period when visits to site were restricted

• Claims of on-site parking are dubious as Staff flood surrounding street parking to ensure quick get away after completing their shifts.
• Revised small scale development should be staged so Montefiore can provide on-site parking for tradespersons rather than major parking disruptions to local residents. There will be large additional traffic disruptions due to the concrete mixers and other large building trucks during the construction stages. Excavation and truck movements will be major for basement carpark plus associated dust and noise.
• Gaza Avenue has been reconfigured by Council to be virtually a one-way, unpassable street so the major impact of the proposed development will be to funnel excessive traffic along the narrow Barons Crescent. Currently residents park on both sides of the street so you must pull over and allow oncoming traffic to pass. Increased traffic volumes and additional on street parking will make the road semi-unusable.
• Proposed building heights are too high and of excessive scale and bulk. The proposal needs to be much more moderate in scale.
• This Medium to High Rise development will look and feel very different to the surrounding R2 Low Rise Two Storey Residential suburb.
• The Planning Proposal fails to meet a core requirement of the current Hunters Hill LEP, namely, achieving a strategic outcome that “Neighbourhoods Reflect Local Character”. DPHI’s own Seniors Housing Design Guide 2023 characterises 2-3 storeys as “Medium Density” and anything above that as “High Density”.
• It fails to meet the principle of consistency with neighbourhood amenity and streetscapes.

Submission Type

I am making a personal submission

Title

First Name

Karyn

Family name

Raisin

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

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Suburb/ Town

Hunters Hill

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No

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submission

Please see uploaded submission Karyn Raisin

On-Line Submission Objection – '**Montefiore Seniors Living Proposal'** 23 January 2026

We are long term residents of Barons Crescent Hunters Hill and before submitting our final submission on the **Montefiore Seniors Living Proposal** under exhibition **Planning Proposal -2023-1109** on DPHI's Planning Portal, sought clarity on some questions.

May we state up front we were struck by the **timing of presentation for community input. Conveniently,** most locals are away on leave, **completely unaware of the Public Exhibition phase.**

Our major concerns and objections are as follows:

- The planned Montefiore Seniors Living Proposal **is a MAJOR redevelopment of the current site** and seeks to amend the Hunters Hill LEP 2012 by **rezoning part of the site from**:

  R2 Low Density Residential to **SP2 Infrastructure (Seniors Housing)** and

  Increase the maximum building height to 24m.

The move to rezone to a SP2 infrastructure (Senior's Housing) allowing four storey (along Barons Crescent) and six storey buildings (within) **sets a new precedent for our LGA for others to follow**.

- This special granting was **hardly in the public interest.**

  The new zoning only benefits what Montefiore 'seeks' to become - a **Residential Care Provider** rather than **Nursing Home provider**. Surely a 'residential zoning' should apply? It doesn't have the relevant infrastructure to justify rezoning as SP2 Infrastructure (Seniors Housing).

- **Missing Infrastructure 8.4 Page 63 – Services Infrastructure Report** concludes **a new Sub Station required** to support future development. **Ian Woods DPIE** advised any decisions regarding **who funds this and the delivery** occurs at the DA stage and Ausgrid and Jemena have an opportunity to provide a submission on this proposal. **Residents do not want a huge sub station built next to them** just to cater to the needs of a **massive residential business development proposal nor should the public purse pay for it.**

- The Planning proposal seeks to **reduce Nursing Home Beds by a third (333 down to 194).** The public know we have an **approaching crisis for Nursing Care Beds given an ageing population**. **Does State Planning or Gateway process just turn a blind eye to this need?** (see enclosed SMH article at end).

- Montefiore Jewish Home has sat within this serene and sensitive bushland setting in **a low density suburb,** originally named Boronia Park, since 1939. To look to demolish and over **overdevelop this land in 2025** with multiple high-rise buildings **for able bodied persons** to **buy multi bedroom units** is **a travesty for surrounding residents** who have built or purchased homes and a lifestyle in this quiet suburb across many years.

A complex of this magnitude needs to be **housed on land that is appropriately located**, preferably within transport corridors, not adjacent to a **protected heritage bushland environment** like Boronia Park which adjoins the Lane Cove River and is part of the Great North Walk. The **anticipated tree loss** along Barons Crescent and **24/7 lighting** will greatly impact general **amenity, character and**

streetscape of this residential area (important considerations highlighted in our LEP 2012) and will have a **negative impact on local wildlife**.

- This Planning proposal will **create a permanent scar of high-rise buildings** within the surrounding suburban/bushland landscape. Further, the site is more than a kilometre away from the nearest Hub so **falls well outside the 800 metre requirement** for new high-rise development set by the Minns' state government.

- The proposal seeks a major **development of 112/118 Independent Living Units**, notably two and three bedrooms with only a handful single bedroom units **rather than what's urgently required,** the development and accommodation of **more Nursing Home/Bed facilities**.

- The Proposal will **greatly Increase Traffic and Parking on local streets –** local residents competing with staff (more than 300) and visitors (unknown) and new unit owners (112/118) with multiple cars to park.

- **A recent Traffic Survey commissioned by Council** for this area demonstrated the **high volume of traffic** which **uses the surrounding streets as a 'rat run' during peak** hours to reach Ryde Road (AM) and Pittwater Road (PM), avoiding the main arterial of Pittwater Road. As a result, **Traffic slowing initiatives** are to be put in place in the surrounding streets off High Street and Park Road. **This new Survey/Report by Council must also inform any future decision making by PPA.**

- **The Traffic Impact Assessment 2.3.4** traffic volume (P.11) describes *Midblock traffic volumes were collected for the Boronia Park Precinct Draft Local Area Traffic Management Plan, which was **completed in June 2021***. **It defies logic the PPA and or Department of Planning (Gateway Process) would accept such statistics** given the **survey took place during Covid** when most worked from home. No wonder P.33 concludes *only a minimal impact expected*. Since 2021, Council has built a large Community Facility within Boronia Park that's increased parking on weekends resulting in parked cars the entire length of Park Road!

  We strongly recommend **the Applicant be requested to undertake a NEW traffic survey in 2026** in light of statistics recently obtained by **Council's Traffic Survey.**

- **Excavation required to build an underground carpark for 200 cars** risks damaging the tree roots of established trees along Barons Crescent and within the site. We know massive **excavation damages the natural underground watercourses that feed nearby trees and bushlands** and believe better Regulations on Excavation for underground carparks needs to be introduced urgently.

- We are also aware **Sydney Water's Northern Suburbs Ocean Outfall Sewer (NSOOS) runs under Barons Crescent**. While the exact path isn't detailed, the NSOOS is a large and deep underground structure.

- **Where is the detail regarding Community Benefit?** Will these new residents be **paying rates** to Hunters Hill council and if not, why not? Has a **Voluntary Planning Agreement (VPA)** been discussed or become a mandatory component of any future stage of approval process?

Previously, Montefiore was described as a **non-profit charitable organisation** with an **income tax exemption status due to the provision of Nursing Home Services to the aged**.

- **Montefiore states** in its Planning Proposal that its development plans '*respond to the need for more seniors housing options for the local community'* and attempts to suggest that they are doing our Council **some kind of favour by increasing density** in a low density neighbourhood to assist future Housing Strategy numbers. The **Gladesville Master Plan** will easily cover the increased target for our LGA.

  It must be noted this facility looks to **decrease rather than increase resident numbers** overall. (Aged care beds down by 139).

  We therefore ask – Is the creation of 112 **non-rate paying Independent Living Units a legitimate addition to Housing Strategy targets???** We think not.

And what of the **threat of Bush Fires** in a warming world of changing climate conditions. How does one evacuate this massive complex of people in side streets **soon to have traffic slowing obstacles to navigate?**

- We note the **Rural Fire Service has forced a change to the LEP** proposed **due to fire hazard** at the location of **Building B** (directly opposite 82 Barons Crescent) and understand the applicant has identified **a potential solution** to the **prohibitive fire rating of Building B** by nominating it could be used as **staff housing**, a lesser fire rating requirement than that for seniors housing. This area has thus been rezoned **Community Use** Strategic Bushfire Strategy (SBS).

  To accommodate such a need we see deliberate wording has been advised ……*'the specific inclusion of the definitions **'community facility'** and **'restaurant'** and **'café'** within the **proposed land use table provides greater certainty*** for these facilities **to be approved in any future DA'.**

  HOW can the public be expected to make a submission based on unknown solutions proffered by the applicant **to accommodate all contingencies given potential of fire risk?**

  Regardless of whether it's a Community Facility, a Medical Centre, a Café or Restaurant you'll still have the **same issue of evacuating the elderly and Senior Citizens** from the entire site if a bushfire situation erupts.

One also wonders **WHY** this particular location has been highlighted and **not other points around the site** given **the site is surrounded by Bushland** from the North to the East and South.

- The **Bush Fire Prone Land Map** on Hunters Hill Council's website clearly demonstrates the **greatest vulnerability for fire** in our LGA is Boronia Park Bushlands that sit beside/behind the **Montefiore site. Appendix N-Strategic Bushfire Strategy (SBS)** identifies the entire side

of the site along High Street (South East) to the end of Barons Crescent (a cul de sac) as **Category 1.**

- The SBS seemingly highlights the solution of **Building B** (North East) to become what's called an **Asset Protection Zone**. Page 70 SBS states.. *The buildings have been strategically positioned to maximize their separation from the bushfire prone land while still complying with the broader requirements…….. and residential building (Building B – see Figure 2**) has been located closest to the bushfire hazard** in the northeast, **serving as a protective barrier for the other structures on the site.** This placement helps to mitigate potential ember attack and radiant heat exposure for the more vulnerable occupants of Buildings A, C and D (see Figure 2) buildings by leveraging the residential structure as a radiant heat shield.*

  However, P 70 SBS also states…***a narrow pinch point*** *(approximately 30 metres) at 80 Barons Crescent presents a **potential constraint**, which **may impact traffic flow during an emergency.*** And then speculates
  ……. *Any bushfire within the adjacent vegetation **is expected to be short-lived with minimal spread, meaning it is unlikely to affect traffic flow.*** Further…..*As a result, **…..does not present a significant barrier to safe evacuation or emergency access**.*

We find the above conjecture - consultant talk based on bulldust**.**

SBS P 61 – 62- Outlines a more detailed risk assessment will be coming…*As the project progresses through subsequent DAs, ……. through the development of a **Bushfire Design Brief……..**to address **complex design challenges**.*

And further proffers

***Engagement with the RFS will facilitate a collaborative approach**, allowing for early identification of any concerns or necessary refinements to ensure the final design appropriately responds to bushfire risks.*

*The rate of spread and the potential for short fire runs **will be key considerations in discussions** …*And……*These insights will directly inform the detailed bushfire modelling undertaken at the DA stage.*

From these readings, it's hard to comprehend exactly what information is relevant. If Planning Proposals can become **a moving feast of amendments and conditions** depending on who says "No or Yes as to what may comply" **exactly what are we commenting on?**

To conclude

The liveability, amenity and retention of our natural environment in this sensitive area should count for something as our existing LEP makes clear

This Planning Proposal and requested re-zoning is nothing more than a **pitch for a new Montefiore Business Model** – '**Residential Care' as opposed to 'Nursing Care'** given the dramatic reduction of nursing beds to be made available to the aged.

No one seems to care about Public Benefit. It has not been highlighted or explained.

The '**process seems totally inadequate'** and has been going on for years yet nowhere is there an explanation as to why this might be?

Montefiore Planning Proposal has been amended from the original version considered by Council in 2023 and Sydney North Planning Panel. **Where once it had to be the whole site rezoned SP2 Infrastructure (Seniors Housing) now it is only part of the site**.

The **original Gateway Determination** stated the **LEP should be completed on or before 5 May 2025**. Therefore, **should not this application have lapsed** by that date given the rules? It was recently replaced by a new condition on 7 November, 2025 "**The LEP should be completed on or before 27 July 2026"**. **We question the transparency and fairness of such a system that sets out rules only to break them or obfuscate without clear explanation**.

This proposal needs to be **'massively scaled back'** to sit harmoniously and unobtrusively within its existing site and our suburb. It's **NOT about a 'needs based development'** at all. Rather, it's about **residential care being more lucrative than nursing care** and the cost is to be incurred by us, the local community and our current way of life.

This is the wrong development in the wrong suburb with inadequate infrastructure or transport corridors or shops or medical facilities in a bushfire prone area of our LGA. It will not assist in increasing housing density targets or council rates nor is there any substantial Public Benefit.

We thank you for the opportunity to submit and sincerely hope our objections to this Planning Proposal will be taken into consideration by the appropriate authority.

Kind regards

Karyn Raisin and Ken Tait

14 Barons Crescent Hunters Hill NSW 2110

[redacted]

SYDNEY MORNING HERALD ARTICLE – January 2026

Healthcare is feeling the pressure like never before

News Nurse practitioner Melissa Freeman was working on an acute ward in 2016 when she took a plan to her bosses to get patients out of hospital quicker. The idea was simple - a "transit lounge" for patients who were well enough to leave the hospital but had other factors, such as a lack of nursing home beds, holding them up. The pilot went well, but never jumped over the bureaucratic hurdles required to make it permanent.

Fast forward to 2026, and patients waiting for discharge to aged and disability care are occupying 1200 beds across NSW every night. "We can't be working that way anymore if we want things to move forward," says Freeman, who now runs a nurse-led clinic in Port Macquarie for patients with chronic conditions who would otherwise be waiting in the local emergency department.

For decades, NSW's population data has warned of a tsunami of ageing and complex patients threatening to over whelm the system. "The wave has genuinely crashed," says the state's chief health bureaucrat, NSW Health Secretary Susan Pearce. Based on current projections, the state's health system will be twice as busy by 2031. About half of that growth will be driven by patients aged over 65.

Pearce warned Health Minister Ryan Park about 18 months ago that if this trend holds, "it'll be catastrophic," Park recalls. "That's now coming to fruition in the worst way possible," he said. Ten years ago, the Herald projected the full force of the post-war baby boom would, by 2026, begin to impact the state's health system. Now it's here, we look back at what we got right, what we didn't see coming (a pandemic, for one), and look at what Sydney's health will look like beyond 2026. More care at home, less in hospital COVID forced the state's health system to go virtual fast.

Park said government-funded urgent care clinics and virtual care hotlines are giving patients with less urgent conditions the chance to avoid the emergency department, "sitting there for 10 hours when you don't really need to". St Vincent's, which operates the public and private hospitals in Darlinghurst, has already said half of its patients will be treated outside hospital through virtual and home care options - by 2030. Anna McFadgen, chief executive of St Vincent's Health Network Sydney, said the transition is essential to ensure the long term viability of the network. "The system is not sustain able in its current form," she said. "If we don't make the shift now, we are really staring down the barrel, I'd say, within five years of a totally unsustainable healthcare system."

Across Sydney and NSW, the number of patients with potentially life-threatening conditions (triage 2 and 3) only continues to rise. Even when the Commonwealth eventually signs a new health funding agreement with the states, Park acknowledges NSW will need to foot more of the bill for looking after an ageing population. "We will have to continue to invest heavily in geriatric out reach, so we take the staff into your home or residential aged care so you don't come in [to hospital]," Park said. "We have no choice ... we've got to, in some areas, go it alone." Responsibility for GPs, pharma cists and nurses Expect GPs, nurses and pharmacists to have greater authority to prescribe more medica tion and treat more conditions than ever before. Since September, GPs have been able to prescribe ADHD medications (and, in some in stances, diagnose the condition); nurse practitioners can prescribe terminations for women up to nine weeks pregnant; and pharmacists can treat urinary tract infections, skin conditions and resupply the contraceptive pill. But change can be slow. Freeman has been qualified to deliver vaccines without a doctor's supervision for more than two years now. Only in December was she allowed to do so without employing a GP at her practice, after months of lobbying NSW Health to change the law. Freeman said Sydney and NSW will need a

combination of existing GP clinics, government-funded urgent care centres, and nurse-led "chronic care" clinics to deal with the challenges of the next decade. "We all have a really important role to play, and there's room for all of us," she said.

Dr Rebekah Hoffman, NSW chair of the Royal Australian College of General Practitioners, said further re forms allowing GPs to prescribe common medications would ensure patients don't have to wait months to see a specialist. "As soon as a GP diagnoses [a patient] with dementia, we should be able to start them on their medication," she said. "They shouldn't need to see a geriatrician to be able to start that." Finally unifying records It's mind-boggling that a world-class healthcare system still relies on fax machines to share patient records while simultaneously rolling out AI innovations. The Single Digital Patient Record (SDPR) system promises to spell the end of the hospital fax machine. It will consolidate every patient's medical record in one place, replacing the individual hospital data systems that currently don't talk to each other. This means that if a patient went to hospital in Broken Hill and then turned up at Royal Prince Alfred, their treating team will be able to see their full record in real time.

Some GPs will also have access to the system, and all patients will be able to view their own records through a separate, secure platform. "It's just going to be a game changer," Pearce said. The rollout begins in March in the Hunter New England Local Health District, and if all goes well, will be live across all NSW public hospitals, community health centres and pathology labs by the end of 2028. The authority charged with the rollout recently received a fail mark on its cybersecurity measures, and NSW Health this month acknowledged the project - already one of the most expensive technology overhauls in the state's history would cost much more than the $969 million first budgeted. In 2016, Pearce's predecessor, Elizabeth Koff, said she was "very confident" that by 2026 most people would be using smart devices to access their digital records and view test results. The SDPR might finally see her prediction come to pass.

The march of AI AI-assisted diagnostic tools have improved exponentially in just a few years, so it is impossible to predict what they will be able to do in a decade. BreastScreen NSW is using AI to interpret mammograms with speed and accuracy, and doctors in Sydney are up to 12 per cent better at diagnosing conditions with an AI-assisted X-ray tool than without. "We have the smartest people in the world," Pearce said. "[AI] is not a staff replacement program ... but you have seen the exponential growth in technology, and we have to keep running alongside it." In GP clinics, Hoffman said AI software taking patient notes will only become more popular with doctors who want to save hours on paperwork and have more meaningful consults with patients. "It is still the very beginning for AI," Hoffman said. "It'll be really interesting to see where it goes."

Melissa Freeman from Port Macquarie Wound Care Clinic.

Photo: Lindsay Moller

SYDNEY MORNING HERALD ARTICLE – December 2025

Australia's most costly health claims revealed

News Private health insurance claims for patients waiting to be discharged to aged care homes have doubled as older people spend almost twice as many days in hospital beds as they did six years ago. The trend emerged in high cost claims data released today, which showed health funds paying up to $700,000 for a single hospital stay.

A shortage of residential care beds and a rise in neurocognitive disorders and mental health conditions including dementia, delirium and depressive disorders are driving long and expensive

hospital stays for patients over 65, the analysis by peak body Private Healthcare Australia (PHA) suggests.

Health insurers, alarmed by the trend, have joined state and territory governments in urging the federal government to find a long-term solution to aged care access issues which have com pounded bed block across the country's health system. "It doesn't matter whether it's a state government with public hospitals, or private health insurers, or veterans affairs - this is a problem throughout the whole sector," The highest private health insurance claim in 2024 was from a patient in her 70s who needed a mitral valve replacement costing $697,267. Other costly claims included a $621,723 treatment for a patient with a kidney infection, $486,479 for an extremely premature birth and $355,760 for a patient with a viral herpes infection. said PHA chief executive Rachel David.

David said addressing the rising cost of aged care places, increasing the workforce and new approaches such as transitioning patients from hospitals into "step-down" hotel rooms, could help alleviate pressure on the health system. "I'm not sure that simply more money is going to fix it," she said. "We do not have sufficient numbers of people to care for the number of people who are coming through into aged care, and the actual places are becoming increasingly expensive."

Australian health funds paid out $16.6 million last financial year to hospitals caring for patients receiving non-acute care while awaiting discharge to aged care. This is more than double the $7.3 million paid out in 2018-19, the last full financial year before the COVID-19 pandemic. The number of older patients waiting in hospital for discharge to aged care jumped from 3363 to 4545 in the same period, a 35 per cent increase. The average cost to the insurer jumped 66 per cent to $3647, partly due to a six-day increase in the aver age length of stay. The highest private health insurance claim in 2024 was from a patient in her 70s who needed a mitral valve replacement cost ing $697,267. Other costly claims included a $621,723 treatment for a patient with a kidney infection, $486,479 for an extremely premature birth and $355,760 for a patient with a viral herpes infection

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

I have attached my submission as a .pdf document.

Submission on the Proposed Amendment from R2 Low Density Residential to SP2 Infrastructure – Montefiore Site, Hunters Hill
From: Resident of [redacted]Gaza Avenue, Hunters Hill
To Whom It May Concern
I am writing as a long-term resident o [redacted]Gaza Avenue, where I have lived in my family's home and wish to remain as I grow older. I am very concerned about the proposed rezoning of the Montefiore site from R2 Low Density Residential to SP2 Infrastructure and

wish to formally object.

1. Parking concerns

The Montefiore site currently has 112 on-site parking spaces, however local observations and visits suggest they are not being used effectively. It appears that staff and visitors are not permitted to park on-site despite many empty spaces. There is no guarantee that future staff, residents, and visitors will have access to the proposed underground parking, and surrounding residential streets cannot absorb overflow parking. I request clear information on how parking will be monitored and enforced to ensure our streets are not overwhelmed or made less accessible for residents and their visitors.

2. Traffic safety and street capacity

Gaza Avenue and its intersections with High Street and Barons Crescent are narrow and already congested. These conditions create a real risk of head-on collisions and often force one-way traffic movements in practice. The Planning Proposal includes no independent traffic study or clear plan to address these risks. Any rezoning must ensure that additional traffic does not worsen safety conditions, and that Montefiore, not residents or taxpayers, is responsible for funding any necessary road upgrades or safety improvements.

3. Pedestrian safety and access

Increased traffic associated with the proposed development would further compromise pedestrian safety, particularly for older residents and families. Access along High Street to parks and public transport is already difficult, and increased vehicle movements and building scale would make walking and using public transport more hazardous.

4. Lack of infrastructure planning

No studies have been provided to demonstrate how increased traffic, parking demand, or pedestrian movement will be managed. There is also no commitment to fund road or traffic safety upgrades. Without this planning, the development would rely on existing infrastructure, shifting cost and risk onto local residents rather than the developer.

5. Strategic and community concerns

There is no shortfall in aged care facilities or retirement villages in Hunters Hill, and like around 80 per cent of older Australians, I wish to age in my own home. The proposed scale and number of independent living units are not supported by population forecasts or demonstrated local need, and there is no evidence that this proposal aligns with local planning objectives or benefits the wider community.

6. Personal impact

As someone choosing to age in my childhood home, I would be directly affected by increased traffic, parking pressure, noise, and reduced pedestrian safety. The character of Gaza Avenue and surrounding streets, and the precedent this proposal would set for Hunters Hill, should not be compromised for a private development.

Drivers going to and from the Montefiore seem oblivious to other road users. Exiting Gaza on to High is exceedingly stressful as the drivers on High appear blind to cars trying to get out of Gaza. These drivers also seem oblivious to the presence of children.

I want to know how the Montefiore defines “local” residents as in all the years I have lived here I have only known two truly local residents move in to the Montefiore and they each told me that apart from themselves they had never met another Hunters Hill resident. Everyone they met had come from more than 7km away.

For these reasons, I respectfully object to the rezoning of the Montefiore site from R2 to SP2 Infrastructure. The current R2 requirements should fulfil without setting precedents and changing the for the Hunters Hill community landscape and future burden our

narrow roads.
Thank you for your consideration.

Submission on the Proposed Amendment from R2 Low Density Residential to SP2 Infrastructure – Montefiore Site, Hunters Hill

From: Resident of [redacted] aza Avenue, Hunters Hill

To Whom It May Concern

I am writing as a long-term resident of [redacted]Gaza Avenue, where I have lived in my family's home and wish to remain as I grow older. I am very concerned about the proposed rezoning of the Montefiore site from R2 Low Density Residential to SP2 Infrastructure and wish to formally object.

1. **Parking concerns**
   The Montefiore site currently has 112 on-site parking spaces, however local observations and visits suggest they are not being used effectively. It appears that staff and visitors are not permitted to park on-site despite many empty spaces. There is no guarantee that future staff, residents, and visitors will have access to the proposed underground parking, and surrounding residential streets cannot absorb overflow parking. I request clear information on how parking will be monitored and enforced to ensure our streets are not overwhelmed or made less accessible for residents and their visitors.

2. **Traffic safety and street capacity**
   Gaza Avenue and its intersections with High Street and Barons Crescent are narrow and already congested. These conditions create a real risk of head-on collisions and often force one-way traffic movements in practice. The Planning Proposal includes no independent traffic study or clear plan to address these risks. Any rezoning must ensure that additional traffic does not worsen safety conditions, and that Montefiore, not residents or taxpayers, is responsible for funding any necessary road upgrades or safety improvements.

3. **Pedestrian safety and access**
   Increased traffic associated with the proposed development would further compromise pedestrian safety, particularly for older residents and families. Access along High Street to parks and public transport is already difficult, and increased vehicle movements and building scale would make walking and using public transport more hazardous.

4. **Lack of infrastructure planning**
   No studies have been provided to demonstrate how increased traffic, parking demand, or pedestrian movement will be managed. There is also no commitment to fund road or traffic safety upgrades. Without this planning, the development would rely on existing infrastructure, shifting cost and risk onto local residents rather than the developer.

5. **Strategic and community concerns**
   There is no shortfall in aged care facilities or retirement villages in Hunters Hill, and like around 80 per cent of older Australians, I wish to age in my own home. The proposed scale and number of independent living units are not supported by population forecasts or demonstrated local need, and there is no evidence that this proposal aligns with local planning objectives or benefits the wider community.

6. **Personal impact**
   As someone choosing to age in my childhood home, I would be directly affected by increased traffic, parking pressure, noise, and reduced pedestrian safety. The character of Gaza Avenue and surrounding streets, and the precedent this proposal would set for Hunters Hill, should not be compromised for a private development.

   Drivers going to and from the Montefiore seem oblivious to other road users. Exiting Gaza on to High is exceedingly stressful as the drivers on High appear blind to cars trying to get out of Gaza. These drivers also seem oblivious to the presence of children.

   I want to know how the Montefiore defines “local” residents as in all the years I have lived here I have only known two truly local residents move in to the Montefiore and they each told me that apart from themselves they had never met another Hunters Hill resident. Everyone they met had come from more than 7km away.

For these reasons, I respectfully object to the rezoning of the Montefiore site from R2 to SP2 Infrastructure. The current R2 requirements should fulfil without setting precedents and changing the for the Hunters Hill community landscape and future burden our narrow roads.

Thank you for your consideration.

Submission Type

I am submitting on behalf of my organisation

Title

First Name

Family name

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters HIll

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

Please accept the attached Hunters Hill Trust's submission to the Montefiore Seniors Living Planning Proposal PP-2023-1109 currently on exhibition.

PRESERVING OUR HERITAGE
PO Box 85, Hunters Hill, NSW 2110
www.huntershilltrust.org.au

Hunters Hill Trust Submission
Planning Proposal PP-2023-1109
Montefiore Seniors Living Proposal

The Hunters Hill Trust objects to the proposal.

The reasons why the Hunters Hill Trust objects to the proposal are set out in the submission below.

Executive Summary

The Hunters Hill Trust (the Trust) would welcome a well-planned proposal for an expanded medium density co-located care facility incorporating an appropriate blend of both residential aged care and seniors independent living at the Montefiore site in Hunters Hill, subject among other things to development being consistent with the aims of the *Hunters Hill Local Environmental Plan 2012* (LEP), in particular 'to maintain and enhance the character and identity of established neighbourhoods'.

However, the Trust opposes the current Montefiore Seniors Living Planning Proposal (PP-2023-1109) in its present form for reasons set out in this submission.

The Trust is firstly concerned that the process undertaken to progress the Planning Proposal to this stage has at best been untidy and has not adequately responded to recommendations made by Hunter's Hill Council (Council), Council's Local Planning Panel (LPP) and indeed the Hunters Hill community, given that community consultation to date has been largely limited to newsletters initially only distributed to part of the Boronia Park precinct closely surrounding the subject site and a community information session run by the proponent, where only 37 people attended.[1]

Appendix A of this submission provides a summary of the process undertaken to date.

The reasons for our objection to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal are summarised below:

The *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) will apply to development of this site and many of its provisions should be carefully considered at the Planning Proposal stage, including provisions relating to water and sewer, bush fire prone

[1] Urbis, *Montefiore Hunters Hill Planning Proposal: Community and stakeholder engagement outcomes report* (3 February 2023) 7 [3.3].

land, design of seniors housing and some non-discretionary development standards. The Planning Proposal proposes what the Housing SEPP and associated *Seniors Housing Design Guide*, which must be considered, would regard as high density development in a low density residential area. The 'Design principles for seniors housing' provided in Schedule 8 of the Housing SEPP, particularly relating to 'Neighbourhood amenity and streetscape', should be applied so that an amended LEP can deliver an acceptable medium density solution.

Bushfire Protection has not been considered holistically by a Strategic Bushfire Study that examines the application of Section 6.4 of 'Planning for Bushfire Protection 2019' across the entire site. The two south eastern lots, accommodating all of the 194 residential aged care beds in existing buildings 'exposed to a higher bushfire risk', have been excised from the Planning Proposal and are not given the same level of attention as the rest of the site. An updated Strategic Bushfire Study must indicate appropriate safe locations on the site for Residential Aged Care Facility (RACF) beds and for Independent Living Units (ILUs) to provide certainty about the site layout in a finalised Masterplan before approval of the Planning Proposal can be considered.

Rezoning Part of the Site to SP2 Infrastructure (Seniors Housing) is accepted as a logical means to provide some certainty about future uses. However, amendment of the LEP Land Use Table by adding 'community facility' and 'restaurant and café' to the uses 'Permitted with consent' for land zoned SP2 Infrastructure is rejected, as this would permit these additional uses of all land in the Municipality that is zoned SP2 Infrastructure, which would create unacceptable unintended consequences. **Proponent led Planning Proposals should not be permitted to amend LEP Land Use Tables. Even if the additional uses of 'community facility' and 'restaurant and café' were confined to SP2 zoned land within the Montefiore site, many community facilities and certainly restaurants would not be acceptable development in low density residential areas like Barons Crescent or Gaza Avenue.**

The Community Needs Assessment (CNA) was criticised in a Report to Hunter's Hill Council in September 2023 for not establishing that the dwelling mix proposed will meet the demand for housing that is more diverse and affordable, to demonstrate the merit of the Planning Proposal. The CNA has not been revised since May 2023 so that it does not consider the changes brought about by the Alteration of Gateway Determination made on 7 November 2025 and in particular the change in use of the proposed Building B from ILUs to a mix of ancillary uses. **The Trust takes the view that the proposed ultimate mix of housing that is to be provided must be examined and guided by a reliable and up to date independent community needs analysis.**

The proposed Building B remains a four storey building which appears to be very large if it is no longer to house ILUs but is instead used for development that is genuinely 'ordinarily incidental or ancillary' to seniors housing, even if that includes staff housing. This in combination with the unacceptable impact of four storey development immediately opposite one and two storey residential development that is set in bushland, leads to the logical conclusion that **the proposed Building B should be of a smaller scale, we would recommend two storey with a maximum height of 8.5 metres.**

Building Heights proposed by the Planning Proposal are generally too high. While we agree with the maximum building height of 8.5 metres in Gaza Avenue, we provide sound reasons to also limit the height of the proposed Building B to 8.5 metres and note that the 16 metre building height for Building A proposed to replace existing development, including two small

cottages in Barons Crescent near the corner of Gaza Avenue, will have a devastating impact on the streetscape and character of the area – refer to Figure 2 below. We therefore recommend that all buildings near the perimeter of the site have a maximum building height of 8.5 metres. Additionally, the 24 metre building height for the proposed six storey Buildings C and D in the middle of the site do not accord with the objectives of the *Seniors Housing Design Guide* for Independent living for medium density, in relation to neighbourhood amenity and streetscape. We therefore recommend that, as the proposed Buildings C and D are some distance from the perimeter of the site, four storey buildings with a maximum height of 16 metres would be acceptable. Whatever heights are settled on for amendment of the LEP, it is essential that they do not provide significant margins for concept designs to expand to fill unutilised parts of the available building envelope at development application (DA) stage.

Site Floor Space Ratios (FSRs) that are in disparity with finally settled maximum heights need to be tightened up to prevent the risks of bulkier and heavier massing than is suggested in the *Site Specific Development Control Plan* and its Masterplan and these documents must be finalised rather than being 'indicative' before considering approval of this Planning Proposal.

A Conservation Management Plan to assess the whole site, as recommended by Hunter's Hill Council's Local Planning Panel, is essential to guide the treatment and management of impacts on items of heritage significance throughout this project and should be prepared by an independent heritage expert.

The Traffic Impact Assessment (TIA) prepared by Urbis is based on out of date vehicle counts that were taken at a time when traffic flows were still reduced by COVID and does not include consideration of recent and future changes that will further increase vehicle counts. The TIA also selectively uses this data by excluding consideration of sections of nearby local road where traffic counts already exceed the environmental maximum capacity. There are other anomalies relating to how on-site parking requirements are assessed. **A reputable, properly qualified and independent traffic engineer should be appointed to prepare a new Transport Impact Assessment, starting with new traffic counts that truly reflect current traffic movements.**

The Sydney North Planning Panel (SNPP) that determined that the Planning Proposal should be submitted for Gateway determination was made up of three members, all State appointees. Future meeting of the SNPP that deal with this Planning Proposal must include a local panel member with a sound understanding of the character and identity of established neighbourhoods in Hunters Hill.

Detailed Submission

The Trust believes, given the deficiencies to date, it is essential that time is taken to address outstanding matters before considering approval of this Planning Proposal that, in its present form, will have unacceptable impacts in an environmentally sensitive part of Hunters Hill.

The discussion below deals with some of the matters the Trust believes must be addressed.

Firstly, some consideration of the roll of and relationship between the principal planning instruments is required.

State Environmental Planning Policy (Housing) 2021

State Environmental Planning Policy (Housing) 2021 (Housing SEPP) and specifically Chapter 3, Part 5 applies to housing for seniors and people with a disability and prevails over other planning instruments, because s 8 (1) of the Housing SEPP provides:

> Unless otherwise specified in this Policy, if there is an inconsistency between this Policy and another environmental planning instrument, whether made before or after the commencement of this Policy, this Policy prevails to the extent of the inconsistency.

In relation to 'Design of seniors housing', s 97 of the Housing SEPP provides:

(1) In determining a development application for development for the purposes of seniors housing, a consent authority **must consider the *Seniors Housing Design Guide***, published by the Department in December 2023.

(2) **Development consent must not be granted to development for the purposes of seniors housing unless the consent authority is satisfied the design of the seniors housing demonstrates that adequate consideration has been given to the design principles for seniors housing set out in Schedule 8.** (Emphasis added)

The first of the 'Design principles for seniors housing' provided in Schedule 8 are:

1 Neighbourhood amenity and streetscape

Seniors housing should be designed as follows—

(a) to recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation,

(b) **to recognise the desirable elements of—**

(i) the location's current character, or

(ii) for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area,

(c) **to complement heritage conservation areas and heritage items in the area**,

(d) **to maintain reasonable neighbourhood amenity and appropriate residential character by—**

(i) providing building setbacks to reduce bulk and overshadowing, and

(ii) using building form and siting that relates to the site's land form, and

(iii) **adopting building heights at the street frontage that are compatible in scale with adjacent buildings,** and

(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours,

(e) to set back the front building on the site generally in line with the existing building line,

(f) to include plants reasonably similar to other plants in the street,

(g) to retain, wherever reasonable, significant trees,

(h) to prevent the construction of a building in a riparian zone.

(Emphasis added)

The above 'Design principles for seniors housing' are entirely consistent with the other principal planning instrument that applies to the site, being the *Hunters Hill Local Environmental Plan 2012* (LEP), which this Planning Proposal seeks to amend.

Although compliance with many of the provisions of the Housing SEPP and associated *Seniors Housing Design Guide* can be left for consideration at development application (DA) stage, it is essential that compliance with some provisions are considered at Planning Proposal stage, including: s 88 Restrictions on occupation of seniors housing; s 95 Water and sewer; s 96 Bush fire prone land; s 97 Design of seniors housing; and some of the non-discretionary development standards of ss 107 and 108.

Importantly, any amendment to the LEP proposed by the Planning Proposal must not attempt to derogate from the provisions of the Housing SEPP.

Bushfire Protection

In attempting to satisfy Condition 1(a) of the Gateway Determination, relating to bushfire protection, the proponent's principal response has been to: firstly excise from the Planning Proposal the south eastern lots of the site, where the 194 RACF beds proposed to be retained are located; and secondly to change the use of the proposed Building B from independent living units (ILUs) to a mix of ancillary uses.

The SIX Maps image in Figure 1 below shows Category 1 vegetation near the southern boundary of Lots 9 and 10 in Deposited Plan 724017. These lots have been excised from the Planning Proposal and are where the 194 RACF beds proposed to be retained are located.

Figure 1: Category 1 vegetation near the southern boundary of Lots 9 and 10 in Deposited Plan 724017. These lots have been excised from the Planning Proposal and are where the 194 RACF beds proposed to be retained are located.
[Source: SIX Maps]

We do not accept that the excision the south eastern lots of the site from the Planning Proposal assists satisfying Condition 1(a) in relation to demonstrating the ability to achieve compliance with the relevant performance criteria in Section 6.4 of 'Planning for Bushfire Protection 2019'. Section 6.4 applies 'In circumstances where new building projects within existing SFPP [Special fire protection purpose] developments are proposed',[2] regardless of whether there is a Planning Proposal. Accordingly, Section 6.4 must be applied across the entire site. This aligns with the Trust's view that bushfire protection must be considered holistically, including consideration of impacts on the surrounding neighbourhood, including both residential development and surrounding bushland.

[2] NSW Rural Fire Service, *Planning for Bush Fire Protection: A guide for councils, planners, fire authorities and developers*, (November 2019) <https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0005/174272/Planning-for-Bush-Fire-Protection-2019.pdf> 52 [6.4].

One of the objectives of Section 6.4 that applies to existing SFPP development is to 'provide a better bush fire protection outcome for existing buildings'.[3] However, in relation to existing buildings very close to the southern boundary and housing RACF beds, the Blackash *Strategic Bushfire Study* appears to rely principally on Montefiore continuing to mitigate risks on its own land and working collaboratively with authorities to reduce risk with some reliance placed on the *Hunters Hill Lane Cove Parramatta Ryde Bushfire Risk Management Committee Bushfire Risk Management Plan 2019 – 2024* designating an asset protection zone [APZ] along the southern interface of the site.[4]

It is noted that Section 3.2.5 of 'Planning for Bushfire Protection 2019' provides:

> In order to guarantee that an APZ can be managed in perpetuity, APZs should be contained within the overall development site and not on adjoining lands.

The risk of bushfire to the proposed Building B from Category 2 vegetation on the opposite side of Barons Crescent has apparently caused the use of this building to change from ILUs to a mix of ancillary uses. On the other hand, the risk of bushfire to buildings near the southern boundary of the site from more hazardous Category 1 vegetation on the opposite side of a footpath has not triggered reconsideration of the use of these buildings for RACF accommodation.

The Trust is concerned about the anomaly between the application of modern standards preventing the occupation of Building B by ILU residents while the more at-risk less physically able RACF residents, who will be more difficult to relocate, can be accommodated in existing buildings 'exposed to a higher bushfire risk'.[5]

An updated Strategic Bushfire Study must indicate appropriate safe locations on the site for Residential Aged Care Facility (RACF) beds and for Independent Living Units (ILUs) to provide certainty about the site layout in a finalised Masterplan before approval of the Planning Proposal can be considered for approval.

Rezoning Part of Site to SP2 Infrastructure (Seniors Housing)

The Trust accepts the logic of rezoning the part of the site where the Planning Proposal applies to SP2 Infrastructure (Seniors Housing), to provide some certainty.

However, **the Trust completely rejects the proposal to amend the LEP Land Use Table by adding 'community facility' and 'restaurant and café' to the uses 'Permitted with consent' for land zoned SP2 Infrastructure**, as proposed at page 35 [7.2] of the Planning Proposal. **Amending the LEP Land Use Table in this way would permit the uses of 'community facility' and 'restaurant and café' with consent, on all land in the Municipality that is zoned SP2 Infrastructure, which would create unacceptable unintended consequences.**

Proponent led Planning Proposals should not be permitted to amend LEP Land Use Tables – this is a matter for Councils.

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3 Ibid.

4 Blackash Bushfire Consulting, *Strategic Bushfire Study Sir Moses Montefiore Jewish Home 116-120 High street, 2-20 Gaza Avenue and 45-47 Barons Crescent, Hunters Hill* (30 September 2025), 19.

5 Ibid.

Even if the additional uses of 'community facility' and 'restaurant and café' were confined to SP2 zoned land within the Montefiore site, many community facilities and certainly restaurants would not be acceptable development in low density residential areas like Barons Crescent or Gaza Avenue.

SP2 Infrastructure (Seniors Housing) zoning creates some uncertainty about what is 'ordinarily incidental or ancillary' to seniors housing. Ideally, this should be clarified to ensure genuinely incidental or ancillary development like a small scale café, occupying a limited area that is largely used by residents, staff and visitors is permitted. On the other hand, development that is less incidental or ancillary to seniors housing such as a medical suite, greater than a limited area that would attract significant clientele with no other reason to visit the site, should not be permitted because it would be entirely inappropriate in residential cul-de-sacs.

There are ways to create greater certainty about what development is permitted, including adding very specific additional permitted uses to Schedule 1 of the LEP, such as:

> Development for the purposes of up to three cafés, each with a total floor area that does not exceed 30m², is permitted with development consent.

Alternatively, although not as legally binding as adding very specific additional permitted uses to Schedule 1 of the LEP, additional uses could be dealt with in the *Site Specific DCP* but to provide certainty, the *Site Specific DCP* would need to be a finalised document, not the indicative document that it currently is, before the Planning Proposal is considered for approval.

Community Needs Assessment

The Planning Proposal refers to its Appendix G as the 'Social Impact Report'. The Appendix G available with the material on public exhibition is headed 'Community Need Assessment' and is dated 25 May 2023.

With respect to the *Community Needs Assessment* (CNA), the report to Hunter's Hill Council's Extraordinary Meeting of 12 September 2023 was clear that, in order to establish strategic and site specific merit, the CNA needed to demonstrate:

> That the dwelling mix proposed by the Planning Proposal will meet the demand for housing that is more diverse and affordable[6] [and]
>
> that potential social impacts can be readily addressed during the subsequent LEP making stages.[7]

Although there is some discussion of Social Infrastructure in the body of the Planning Proposal itself, there is no 'Social Impact Report' on public exhibition so that any negative social impacts are not considered. The CNA has not been revised since May 2023 so that it does not consider the changes brought about by the Alteration of Gateway Determination made on 7 November 2025 and in particular the change in use of the proposed Building B from ILUs to a mix of ancillary uses. Consequently, there is little if any consideration of the

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6 Hunter's Hill Council, *Extraordinary Meeting No 4524* (12 September 2023) <https://huntershill.infocouncil.biz/Open/2023/09/OC_20230912_AGN_1841_AT_EXTRA.PDF>, 14.

7 Ibid 15.

social impacts of the ancillary uses of Building B to allow these to be addressed during the LEP making stages.

It would appear that the dwelling mix proposed by the Planning Proposal is now being driven by where ILUs can be located to satisfy Condition 1(a) of the Gateway Determination rather than by any community needs analysis. Furthermore, there appears to be no consideration of affordable housing, although it is accepted that including staff accommodation in Building B might be regarded in this light, provided that it is affordable.

Any development of this site should be in accordance with *State Environmental Planning Policy (Housing) 2021*, Chapter 3, Part 5 Housing for seniors and people with a disability, which defines seniors to include 'people who are at least 60 years of age'.[8] This would result in ILUs normally having at least one resident of at least 60 years of age (rather than the earlier proposed 55 years), which would have a number of advantages, including reducing demand for the now reduced number of ILUs and a likely reduction in traffic movements with slightly older residents less likely to travel to a place of employment.

There has been considerable community angst about the loss of aged care beds to make way for 'luxurious' ILUs.[9] However, **the Trust takes the view that the proposed ultimate mix of housing that is to be provided must be examined and guided by a reliable and up to date independent community needs analysis.**

Given the limited community consultation to date, it is also important that greater community input is sought in updating the community needs analysis.

Building B

The proposed Building B remains a four storey building with a gross floor area of 3197 m², which appears to be extraordinarily large in scale if it is no longer to house ILUs but is instead used for development that is 'ordinarily incidental or ancillary' to seniors housing as permitted by the proposed SP2 Infrastructure (Seniors Housing) zoning and we have already made a strong case that SP2 Infrastructure uses cannot be extended by adding 'community facility' and 'restaurant and café', particularly if this involves amending the Land Use Table.

There has also been discussion of **extending the use of Building B to accommodate others beyond seniors, those who cohabit with seniors and staff. We note that this cannot occur as it would subvert the provisions of s 88 of the Housing SEPP, relating to Restrictions on occupation of seniors housing.**

There is concern that a building of the scale of the proposed Building B, without ILUs, would struggle to attract sufficient development that is genuinely 'ordinarily incidental or ancillary' to seniors housing, even if staff accommodation is included. Despite the discussion above, a large building where limited uses are permitted, might see an attempt to accommodate businesses only having a loose connection with seniors housing, which would be inappropriate in a low density residential neighbourhood.

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8 *State Environmental Planning Policy (Housing) 2021*, s 82.

9 See, eg, Equity Development Management, *Montefiore Seniors Living Development Randwick, NSW*, (accessed 15 January 2026) <https://equitydm.com.au/montefiore-seniors-living-development-randwick-nsw/>.

This concern, combined with the unacceptable impact of four storey development immediately opposite one and two storey residential development that is set in bushland, leads to the logical conclusion that the proposed Building B should be of a smaller scale, we would recommend two storey with a maximum height of 8.5 metres.

Building Envelopes

The Trust shares the concerns of many about the height, bulk and scale of development that could be permitted, should this Planning Proposal be approved as currently presented.

In line with the aims of the current LEP, the tree lined streetscapes and the amenity of low density residential development, set not just in gardens but in bushland in this environmentally sensitive part of Hunters Hill, must remain protected by an LEP that prevents the encroachment of buildings of excessive height, bulk and scale near low density residential housing.

Building Heights

Good planning also dictates that there should be gradual transitions in building heights not abrupt changes as will occur if four storey development is permitted adjacent to the perimeter of the site, even with increased setbacks.

This principle is reflected in the Housing SEPP Schedule 8 'Design principles for seniors housing' 1 (d) (iii) of 'adopting building heights at the street frontage that are compatible in scale with adjacent buildings'.

The Trust supports the proposed maximum height of 8.5 metres in Gaza Avenue but does not accept that Barons Crescent should be treated any differently just because it is a wider street with more trees. One and two storey residential development opposite the site in Barons Crescent, particularly those with street frontages (as distinct from battle axe blocks), will be unacceptably impacted by four story development, even with a 10 metre setback, increasing to 13 metres at higher levels.

With a maximum building height of 8.5 metres in Gaza Avenue and sound reasons to also limit the height of the proposed Building B to 8.5 metres, the proposed Building A on the corner of Barons Crescent and Gaza Avenue is the only other proposed building near the perimeter of the site to be considered.

The photograph in Figure 2 below shows the existing single storey cottage on the corner of Barons Crescent and Gaza Avenue. The replacement of this cottage with a four story building, even with greater setbacks and articulation, will have a devastating impact on the streetscape and character of the area.

Figure 2: Single storey cottage on the corner of Barons Crescent and Gaza Avenue. The replacement of this cottage with a four story building, even with greater setbacks and articulation, will have a devastating impact on the streetscape and character of the area.

For the reasons given above, **the Trust is firmly of the view that the maximum building height of all buildings adjacent to the perimeter of the site must remain at the present maximum building height of 8.5 metres.**

As discussed above, development of this site must be in accordance with *State Environmental Planning Policy (Housing) 2021*, Chapter 3, Part 5 Housing for seniors and people with a disability and be medium density in scale. It is noted that the design principles in the associated *Seniors Housing Design Guide* for Independent living for medium density, in relation to neighbourhood amenity and streetscape, have the objectives:

> To provide two or three storey housing clusters where the scale and massing is articulated and separated to respect the character and pattern of the suburban surroundings.
>
> To positively enhance the streetscape and uplift the quality of built form in the neighbourhood, and provide a landscape buffer to soften the development.[10]

[10] NSW Planning & Environment, *Seniors Housing Design Guide*, (November 2023) <https://www.planning.nsw.gov.au/sites/default/files/2023-07/seniors-housing-design-guide.pdf> 101 [15.1.1]-[15.1.2].

Clearly, the proposed six storey Buildings C and D in the middle of the site do not align with these objectives and should be reduced to no more than four storeys with a maximum building height of 16 metres.

The report to Hunter's Hill Council's Extraordinary Meeting of 12 September 2023 raised the prospect of:

> The disparity between the maximum heights and floor space ratio (FSR) versus the number of storeys and actual gross floor area (GFA) of the reference scheme open up risks of taller, bulkier and heavier massing …[11]

It is noted that, the maximum building heights proposed in the Planning Proposal exceed by significant margins the building heights shown in the proponent's *Urban Design Report*, which shows a concept design.[12]

Whatever heights are settled on for amendment of the LEP, it is essential that they do not provide significant margins for concept designs to expand to fill unutilised parts of the available building envelope at DA stage.

Floor Space Ratio (FSR)

There are also concerns regarding the proposed floor space ratio (FSR) of 1:1 across the entire site. FSR calculations on page 31 of the *Urban Design Report* reveal that the concept designs only require an FSR of 0.83:1 so there is potential for bulkier designs to be submitted at DA stage.

When building heights are settled, FSR calculations similar to those included in the *Urban Design Report* should be prepared to establish an FSR to ensure the amended LEP will prevent excessively bulky buildings and leave appropriate open space for tree preservation and the enjoyment of residents and visitors.

Masterplan within the *Site Specific DCP*

It is also noted that the Masterplan within the *Site Specific DCP* is only indicative. The *Site Specific DCP* and Masterplan should be finalised to provide some certainty about the kind of development the Planning Proposal might enable.

As Councils are the body that usually adopts development control plans, Council must be involved in the development and approval of any *Site Specific DCP*.

Heritage

At its meeting on 22 June 2023, the Hunter's Hill Local Planning Panel (LPP), although only in an advisory capacity, among other things resolved unanimously that:

> A conservation plan to assess the whole site including the garden and synagogue be prepared by an independent heritage expert …

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11 Hunter's Hill Council, above n 6, 21.

12 Jackson Teece, *Strategic Planning Proposal Urban Design Report* (October 2025) 13 [2.2].

Instead, the proponents have continued to rely on the report *Heritage Assessment & Opportunities & Constraints: Montefiore Hunters Hill* (Urbis Heritage Report), of November 2021, which having been prepared by Urbis is not independent.

However, the Trust supports the Urbis Heritage Report's Assessment of Significance that:

> The Montefiore Garden has local heritage significance at a historical, aesthetic, social and representative level.[13]

The Trust, with some concern, accepts the Urbis Heritage Report's Assessment of Significance that:

> The Cyril Rosenbaum Synagogue … is considered to have low Local heritage significance for its associative and social significance and possibly some aesthetic significance …[14]

Although the proposed *Site Specific DCP* includes the extant Synagogue, there appears to have been consideration of its demolition or relocation. It is noted that the Planning Proposal, with a Masterplan that is only 'indicative', leaves open the possibility of future DAs including demolition or relocation of the Synagogue.

Not mentioned in the Urbis Heritage Report, is the World War II communications bunker located to the west of the Montefiore Garden.

The Trust would not support the demolition or relocation of the Synagogue or any disturbance of the World War II communications bunker, in the absence of a conservation management plan providing sound reasons for such actions.

The Trust again stresses the importance of preparation of a conservation management plan prepared by an independent heritage expert, as recommended by the LPP, to guide the ongoing development of the site in a manner that respects heritage significance.

Traffic Management

Presently nearly all vehicular access to the current facility is via High Street. The eastern end of High Street beyond Gaza Avenue, being a dead end is only used for vehicular access to the Montefiore site and to some parking near the Boronia Park North Playground. Boronia Park Reserve occupies all land to the south of this section of High Street. This arrangement minimises the impact of traffic movements in and out of the site on the surrounding neighbourhood.

The proposal for additional vehicular access to both underground parking and loading docks from Barons Crescent is not supported as this would introduce additional traffic movements, including heavy delivery and service vehicle movements, into a quiet residential cul-de-sac. The proposed turning bay, to allow forward-in and forward-out movements for all service and delivery vehicles accessing the site, should be located underground and accessed only from the existing driveways off High Street.

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[13] Urbis, *Heritage Assessment & Opportunities & Constraints: Montefiore Hunters Hill* (November 2021) 51 [6.3.3].

[14] Ibid 55 [6.4].

With respect to the *Montefiore Hunters Hill Planning Proposal – Transport Impact Assessment* (TIA), firstly there is concern that it is based on traffic volumes collected for the *Boronia Park Precinct Draft Local Area Traffic Management Plan* (LATMP), which was completed in June 2021, at a time when traffic volumes were significantly impacted by COVID.

Secondly, the traffic volumes collected will not reflect traffic volumes generated by the Boronia Park Sports and Community Facility, the construction of which had not even commenced at the time data was collected for the LATMP.

Thirdly, Hunter's Hill Council has recently moved a large part of its works depot and functions of its works office into new or restored facilities within Boronia Park Reserve, meaning many of the movements of Council vehicles and equipment and the vehicles of some employees is now through the Boronia Park precinct.

Fourthly, the TIA makes no allowance for the future impact on traffic generated by future development in the Boronia Park precinct that will be permitted under the NSW Government's *Low and Mid-Rise Housing Policy* which came into effect early in 2025.

Fifthly, the TIA uses information from LATMP selectively, ignoring that even in the COVID impacted times of the LATMP the weekday morning peak hour traffic volumes in the section of High Street between Blaxland Street and Pittwater Road already exceeded the environmental maximum capacity standard for local roads of 300 vehicles per hour.[15] Refer to Figure 3 below.

[15] Urbis, *Montefiore Hunters Hill Planning Proposal – Transport Impact Assessment* (30 September 2025) 11 [2.3.4] cf ptc., *Boronia Park Precinct Draft Local Area Traffic Management Plan* (15 June 2021) <https://ehq-production-australia.s3.ap-southeast-2.amazonaws.com/087a012b129707cc0c32eae74dcdbda4304bb5a5/original/1715583984/a4d0ceef480ab2931b27d228b5504a27_ptc.-Boronia-Park-Precinct-Draft-LATMS-June2021.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIII4DU7AG%2F20260113%2Fap-southeast-2%2Fs3%2Faws4_request&X-Amz-Date=20260113T025558Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=7d306c770f1a1ccfda28c1b0d3d68c3ea1ba5ca6c2ec42d18dbf9accb2d2e416> 11, 13 [3.2].

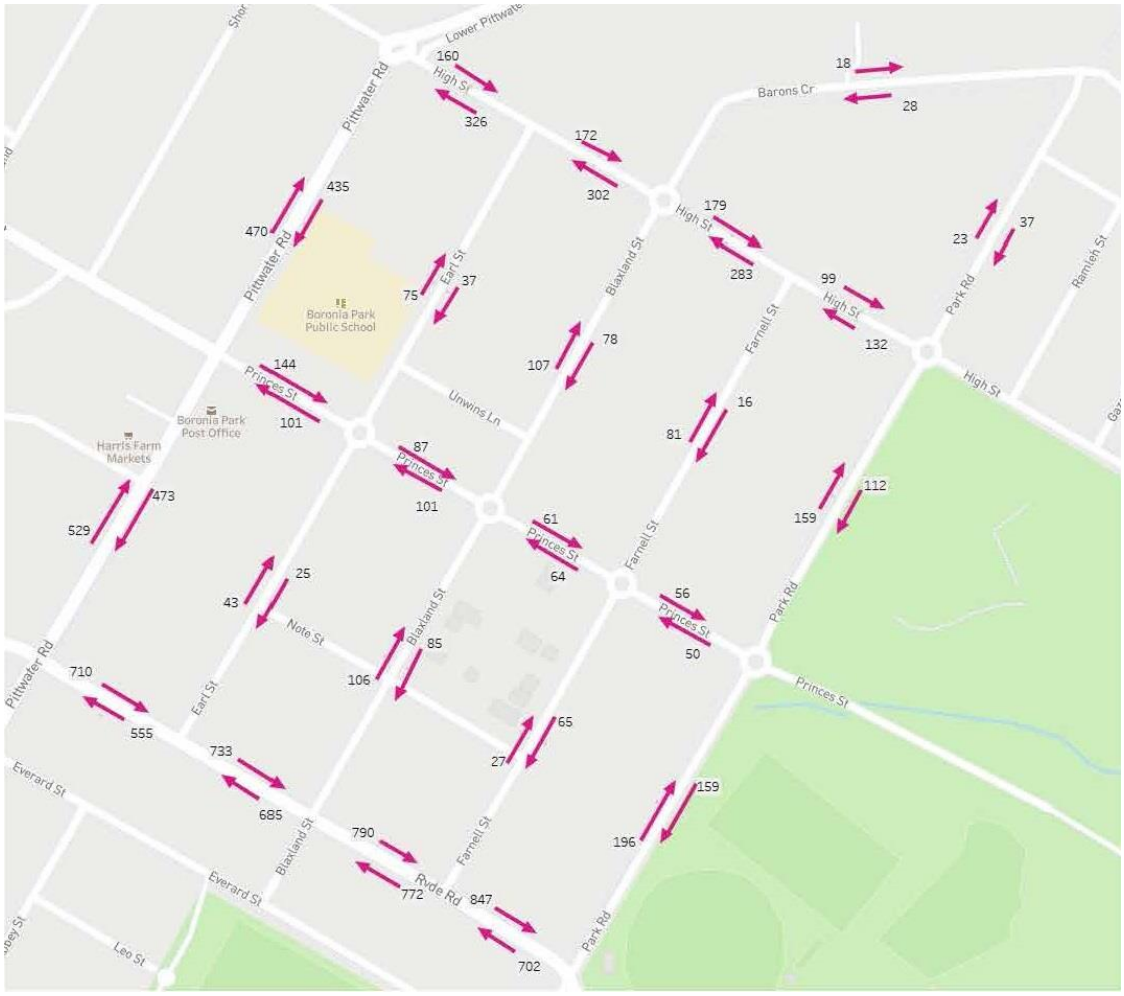

Figure 3: Weekday morning peak hour traffic volumes show that, even in the COVID impacted times of the LATMP, the weekday morning peak hour traffic volumes in the section of High Street between Blaxland Street and Pittwater Road already exceeded the environmental maximum capacity standard for local roads of 300 vehicles per hour. [Source: ptc., *Boronia Park Precinct Draft Local Area Traffic Management Plan* (15 June 2021) p 11 Figure 5.]

These weekday morning peak hour traffic volumes will largely coincide with 9:00 am shift changeover time when the largest number of staff will be arriving at and departing from the site, with those travelling to or from the north or west most likely to travel on High Street between the site and Pittwater Road, with additional staff adding to vehicular movements on a road where the environmental maximum capacity standard for local roads is already exceeded. This will be further exacerbated with the additional movements of ILU residents, many of whom will be very capable of driving themselves to their place of employment or out for other daily activities.

There are other anomalies with the TIA, including:

> The number of ILUs in the proposed Buildings A, C and D is stated to be 112 and this number appears to be used in most analysis but there appears, as far as it is possible to see, no allowance for ILUs in the proposed buildings along Gaza Avenue.
>
> Table 3 proposes a breakdown of car parking, allocating 30 car parking spaces for RACF staff while Table 5 anticipates staffing levels up to 73 across all staff, however

the non-discretionary development standards for hostels and residential care of the Housing SEPP require at least '1 parking space for every 2 employees who are on duty at the same time.'[16] Given the paucity of the TIA, there appears to be no justification for allowing non-compliance of this non-discretionary development standard under s 4.15 (3) of the *Environmental Planning and Assessment Act 1979*.

It would appear there are substantial deficiencies with the TIA, both in terms of assessing the number of on-site parking spaces required and assessing the impact on local roads in the Boronia Park precinct that we do not believe have sufficient capacity to cope with the additional traffic, which will be generated by development of the scale proposed in this Planning Proposal.

It is essential that an up to date Transport Impact Assessment that properly considers the matters raised above, as well as matters raised in other submissions, be prepared before this Planning Proposal progresses further. To achieve this, a reputable, properly qualified and independent traffic engineer should be appointed to prepare a new Transport Impact Assessment, starting with new traffic counts that truly reflect current traffic movements.

Impacts must not be Considered in Isolation

Above, in relation to fire protection, we expressed concern about the more at-risk less physically able RACF residents, who will be more difficult to relocate, being located in buildings 'exposed to a higher bushfire risk'.

In relation to traffic management, we have also identified substantial deficiencies with the TIA.

In the event of a bushfire, it will certainly be necessary to provide access for firefighting appliances and it may also be necessary to evacuate some senior residents from the site.

The impact of possible traffic congestion on these emergency traffic movements must be analysed and viable solutions explained.

Independence of Supporting Material

We note that as well as preparing the Planning Proposal, Urbis prepared seven of the 14 Appendices that the Planning Proposal relies on.

Although the Planning Proposal and the seven Appendices prepared by Urbis provide the names of the authors and their positions in the organisation, only two of the Appendices provide any details of the qualifications the authors that give them the expertise to prepare such material.

A number of the documents are dated having been prepared before significant changes were made to the Planning Proposal so that the impacts of these changes are not considered.

The *Transport Impact Assessment*, in particular, is based on out of date vehicle counts that were taken at a time when traffic flows were still reduced by COVID and does not include consideration of recent and future changes that will further increase vehicle counts. The TIA

[16] *State Environmental Planning Policy (Housing) 2021*, s 107 (2) (i).

also selectively uses this data by excluding consideration of sections of a nearby local road where traffic counts already exceed the environmental maximum capacity.

We strongly recommend that a number of the supporting documents be replaced by up to date reports prepared by appropriately qualified independent experts, detailing their qualifications and experience in preparing such material.

Composition of Sydney North Planning Panel

Hunter's Hill Council's Sydney North Planning Panel (SNPP) representatives David Logan and Barry Buffier were excluded from the Sydney North Planning Panel that met on 18 December 2023, resulting in the Panel of three all being State appointees. At this meeting it was determined that the Planning Proposal should be submitted for Gateway determination.

The Trust recommends that any future meeting of the SNPP that deals with this Planning Proposal must include a local panel member with a sound understanding of the character and identity of established neighbourhoods in Hunters Hill.

Conclusion and Recommendations

Fair assessment of this complex Planning Proposal demands that supporting material be up to date and reliable. This submission has identified numerous deficiencies in supporting material. The next step must be for the proponent to appoint independent appropriately qualified experts to update or, in some cases, replace material that this Planning Proposal relies on.

This submission also makes recommendations about the avoidance or mitigation of impacts that are likely to occur if the Planning Proposal is approved as currently presented. These impacts include: bushfire risks; traffic congestion; zoning permitting inappropriate uses that will exacerbate traffic and parking issues in cul-de-sacs that serve low density residential development; and the impact of four and six storey development on the streetscape and character of the area.

The level of these impacts makes clear that development that will be permitted should this Planning Proposal be approved is simply too large in scale.

The analysis presented in this submission affirms the long held position of the Trust that the development of the Montefiore Hunters Hill site for expanded seniors housing should be medium density in scale.

We hope this submission will assist in finding solutions that will deliver a medium density co-located care facility incorporating an appropriate blend of both residential aged care and seniors independent living at the Montefiore site in Hunters Hill, consistently with the aims of the *Hunters Hill Local Environmental Plan 2012*, and in particular 'to maintain and enhance the character and identity of established neighbourhoods'.

Appendix A

Summary of the Process Undertaken to Date

Rejection of Initial Planning Proposal Lodgement

The Montefiore Planning Proposal was initially lodged in February 2023 but was rejected because there was no pre-lodgement meeting and no scoping study. Following rectification of these defects, lodgement of the Planning Proposal was accepted by Hunter's Hill Council in May 2023.

Local Planning Panel Meeting held on 22 June 2023

Council took little time to prepare a report to its Local Planning Panel, which on 22 June 2023 unanimously resolved:

1. That the Local Planning Panel does not support sending the Planning Proposal to Gateway Determination.
2. That the Local Planning Panel provides the following advice to Council:
    i. Preliminary analysis of technical reports is required;
    ii. Adequate time for assessment of the Proposal by the Local Planning Panel is needed;
    iii. There is a need for contextual understanding of the impacts of similar aged care sites within the Municipality;
    iv. A conservation plan to assess the whole site including the garden and synagogue be prepared by an independent heritage expert;
    v. The Panel recommends wider community consultation prior to gateway determination, including providing information on the process of a Planning Proposal and gateway determination.

Council Ordinary Meeting held on 26 June 2023

At its Ordinary Meeting held on 26 June 2023, Hunter's Hill Council considered as a Late Item a report on the Montefiore Planning Proposal, resolving among other things 'That further review and detailed assessment of [11] technical reports supporting the Planning Proposal be undertaken'.

Early Plan Changes

As recorded in a report to the Extraordinary Meeting of Hunter's Hill Council held on 12 September 2023, the Planning Proposal was amended in relation to:

- Height: A reduction in the numerical maximum building height standard from: - 26m to 24m in centre of the site. - 18m to 16m in northern part of site.
- Setbacks: An increase in building setback from the boundary adjacent to Barons Crescent from: - 7m to 10m at lower levels (ground, first and second level). - 10m to 13m at the top level.

- Roof level - Insertion of a new roof-top service equipment control within the Draft Site-specific Development Control Plan (Draft DCP) to restrict roof-top plant to 25% of the roof plane.
- Land Use Mix - Clarification regarding the proposed land use mix of residential aged care facilities (RACF) and independent living units (ILUs) for the purposes of assessing the proposal.[17]

Extraordinary Meeting of Council held on 12 September 2023

Although recommending that Hunter's Hill Council forward the Montefiore Planning Proposal to the Department of Planning and Environment seeking a Gateway Determination, even with the above amendments, the summary of findings from review and detailed assessment of technical reports, in the report to Council's Extraordinary Meeting held on 12 September 2023, was critical of the Proposal in many respects, including:

With respect to the Arboricultural Assessment and Landscape, that:

> There is concern regarding the increase in maximum building height from the current 8.5m to 16m and 24m on the amenity of the surrounding residential areas …
>
> The Preliminary Assessment does not provide a detailed assessment of the impact of the proposed works on the site's tree population. An Arboricultural Impact Assessment & Tree Protection Plan should be prepared as detailed within the review.[18]
>
> …
>
> Any impact to the existing trees due to bushfire requirements must be addressed within the Arboricultural Impact Assessment.[19]

With respect to the Bushfire Assessment, that:

> The development, in its current format cannot achieve full compliance with the general provisions for SFPP [Special Fire Protection Purpose] development, however, it is likely that full compliance to all Bushfire Protection Measures on such a proposal will not be practically achievable, and that some variations to these measures could be appropriately considered.[20]

With respect to the Community Needs Assessment (CNA) and Strategic Merit, that:

> The CNA report should have set out to establish the following points, to demonstrate the merit of the planning proposal:
>
> 1. That the dwelling mix proposed by the Planning Proposal will meet the demand for housing that is more diverse and affordable.[21]
>
> …

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17 Hunter's Hill Council, *Extraordinary Meeting No 4524* (12 September 2023) <https://huntershill.infocouncil.biz/Open/2023/09/OC_20230912_AGN_1841_AT_EXTRA.PDF> 6-7.

18 Ibid 10.

19 Ibid 11.

20 Ibid 13.

21 Ibid 14.

With respect to the Community Needs Assessment (CNA) and Site Specific Merit, that:

> Consideration of Social Impacts by the Community Needs Assessment (CAN) [sic] - Few aspects of social impact have been considered by the Planning Proposal. Consequently, the Planning Proposal is unable to demonstrate that the proposal has merit, nor that potential social impacts can be readily addressed during the subsequent LEP making stages.
>
> We recommend that the Gateway Determination require that this issue be further examined prior to public exhibition.[22]

With respect to the Transport Impact Assessment, that:

> Supporting documents (parking report, construction traffic management plan and traffic impact study) addressing matters raised within the review document, must be submitted to Council for assessment before a decision on the Planning Proposal, either to support or refuse the development, can be made.[23]

With respect to the Urban Design Report, that:

> the documents that will guide future development are too simplistic and will not be sufficient to ensure quality outcomes.
>
> The disparity between the maximum heights and floor space ratio (FSR) versus the number of storeys and actual gross floor area (GFA) of the reference scheme open up risks of taller, bulkier and heavier massing than is suggested through the masterplan and the objectives and controls in the site-specific development control plan (SSDCP) need to be tightened up to prevent this as far as possible.[24]

At Extraordinary Meeting 4524 of Hunter's Hill Council held on 12 September 2023, Council resolved by a five votes to two majority 'That Council does not support the Montefiore Planning Proposal', for numerous reasons set out in the resolution, which is included at Appendix B of this submission.

Meeting of Sydney North Planning Panel held on 18 December 2023

Hunter's Hill Council's Sydney North Planning Panel representatives David Logan and Barry Buffier were excluded from the Sydney North Planning Panel that met on 18 December 2023, resulting in the Panel of three all being State appointees.

Despite the findings from the review and detailed assessment of technical reports in the report to Council and the reasons given by Council to not support the Planning Proposal, the Panel determined that the Planning Proposal should be submitted for Gateway determination.

Gateway Determination

On 23 April 2024, the Director at the Department of Planning, Housing and Infrastructure, as delegate of the Minister for Planning and Public Spaces, determined that an amendment to

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22 Ibid 15.

23 Ibid 20.

24 Ibid 21.

the *Hunters Hill Local Environmental Plan 2012* to rezone the site from R2 Low Density Residential to SP2 Infrastructure (Seniors Housing) and increase the maximum building height and the floor space ratio, should proceed subject to conditions including relating to bushfire protection and Integrating Land Use and Transport.

It is noted that the determination found that 'the planning proposal is categorised as complex as described in the *Local Environmental Plan Making Guideline*',[25] meaning that Hunter's Hill Council should have been given 115 days rather than the 90 days it had to review and assess the Planning Proposal. The additional 25 days could have been productively utilised to better address some of the shortcomings of the proposal discussed above.

Alteration of Gateway Determination

The original determination specified that 'The LEP should be completed on or before 5 May 2025.' It is noted that the time to complete the LEP lapsed six months before an Alteration of Gateway Determination was made on 7 November 2025.

The amended determination includes very significant changes with the excision of Deposited Plan 724017 Lots 9 and 10 in the south east corner of the site from the Planning Proposal. It is noted that these lots are occupied by the 194 Residential Aged Care Facility (RACF) beds it is proposed be retained. It is presumed these lots were excised from the proposal because the 'existing aged care building is exposed to a higher bushfire risk' being 'located adjacent to a large area of remnant Category 1 vegetation to the south, presenting a more significant bushfire hazard due to the extent and continuity of fuels',[26] making it more difficult to satisfy the conditioning of the earlier determination to:

> Carry out consultation with the NSW Rural fire Service (RFS) to inform the planning proposal so that it addresses the potential overall increase in occupancy numbers on the site and can demonstrate the ability to achieve compliance with the relevant performance criteria in Section 6.4 in 'Planning for Bushfire Protection 2019'.
>
> The planning proposal is to be updated to address the consistency with Section 9.1 Direction 4.3 Planning for Bushfire Protection and demonstrate justification for the planning proposal.[27]

The other substantial change that appears to have been brought about in response this conditioning of the Gateway Determination is:

> that Building B, which is affected by the Category 2 Brushfire Prone Land to the North East of the site has been reconfigured from independent living units to mix of ancillary uses, including administration, communal facilities and staff housing, to meet the APZ [Asset Protection Zone] setback requirements of the Planning for Bushfire Protection 2019 (PBP).[28]

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[25] Department of Planning, Housing and Infrastructure, *Gateway Determination Planning proposal (Department Ref: PP-2023-1109)* (23 April 2024) Condition 4(d).

[26] Blackash Bushfire Consulting, *Strategic Bushfire Study Sir Moses Montefiore Jewish Home 116-120 High street, 2-20 Gaza Avenue and 45-47 Barons Crescent, Hunters Hill* (30 September 2025) 19, 46.

[27] Department of Planning, Housing and Infrastructure, above n 25, Condition 1(a).

[28] Blackash Bushfire Consulting, above n 26, 11.

Appendix B

Resolution 179/23 of Hunter's Hill Council at Extraordinary Meeting 4524 held on 12 September 2023

Council resolved by a five votes to two majority:

That Council does not support the Montefiore Planning Proposal for the reasons set out below:

1. The Planning Proposal lacks strategic merit and fails to meet site-specific merit and meet relevant Government guidelines and community expectations:
2. The Hunters Hill Planning Panel highlighted inadequate community consultation and reports (*these remain significantly unaddressed*). The Local Planning Panel does not support sending the Planning Proposal to Gateway Determination.
3. The proposed building heights are too high and out of local character. The proposal needs to be far more moderate in scale and meet the standards of *SEPP (Housing)* Part 5 Housing for seniors and people with a disability.
4. There will be serious impacts for the local area from the current proposal, including:
    i. A significant increase in traffic in an area where Council's own *Boronia Park Precinct: Local Area Traffic Management Plan* found Key Issues, including: Rat running; Traffic speeds and irresponsible driving; Pedestrian safety; and Parking.
    ii. The site being in an isolated location away from major roads, transport and facilities.
    iii. The proposed entry to the underground carpark and Loading Dock in Barons Crescent will have impacts on houses opposite and surrounding area.
    iv. The proposed pedestrian entry near the Synagogue is likely to cause parking impacts in Barons Crescent.
5. An unprecedented rezoning of residential land to SP2 (Seniors Housing), will set a serious precedent for the Municipality of Hunter's Hill (and beyond) by allowing zoning and heights that are not consistent with the Hunters Hill LEP.
6. Residential zoning should be used as:
    i. The site does not have existing infrastructure of the kind which is contemplated by the SEPP (Infrastructure). Nor does the Planning

Proposal or subsequent development envisage that this will change. The existing and proposed use of the site is residential.

ii. The Planning Proposal seeks to avoid compliance with the SEPP (Housing) by characterising the site and its uses as something which they are not; namely infrastructure.

iii. Assessment must have regard to the planning principles including, here, the *SEPP (Housing)*.

7. The Proponent's right to redevelop is acknowledged, but the proposal must recognise the Design principles set out in Part 5 Division 6 of the *SEPP (Housing)*, including:

i. Neighbourhood amenity and streetscapes, including current character; heritage conservation; and

ii. Visual and acoustic privacy.

8. The Site Specific DCP is inadequate and will not apply if a future development application is State significant development.

9. Council has inadequate information to make a well-informed decision to progress the Planning Proposal. Council is of the view that the report by the Director of Town Planning highlights numerous issues with the Planning Proposal where important requirements are either not satisfied or not satisfied to an adequate standard. These issues must be addressed.

10. The Planning Proposal is not consistent with the requirements of Hunter's Hill

Future Transport Strategy 2056 being:

i. new development should ideally occur on the major trunk transit network; and

ii. new development should ideally occur in proximity to the local centres and transport hubs with the LGA.

11. Consultation with the community has been inadequate and not addressed since

i. Council's Resolution 249/22 RESOLVED That Council: 1. Receive and note the resolutions unanimously passed by the residents at the meeting as listed in the attachment to this report; and 2.Resolve that should Council form a view that the proposal have strategic merit Council hold a community consultation meeting at the Town Hall as soon as practicable and before submission by Council for gateway determination; and

ii. the Local Planning Panels advice. The Council's report states "… it is our opinion that the applicant has not adequately consulted the local community. A consideration should ensure that a broader range of community views are sought."

12. The Planning Proposal fails to meet key requirements which are a central part of the current Hunters Hill LEP. The LEP has a strategic outcome that is not met in the report “Neighbourhoods Reflect Local Character”.

13. That Council invite Montefiore to resubmit an alternative proposal consistent with a residential site zoning.

PRESERVING OUR HERITAGE
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Hunters Hill Trust Submission
Planning Proposal PP-2023-1109
Montefiore Seniors Living Proposal

The Hunters Hill Trust objects to the proposal.

The reasons why the Hunters Hill Trust objects to the proposal are set out in the submission below.

Executive Summary

The Hunters Hill Trust (the Trust) would welcome a well-planned proposal for an expanded medium density co-located care facility incorporating an appropriate blend of both residential aged care and seniors independent living at the Montefiore site in Hunters Hill, subject among other things to development being consistent with the aims of the *Hunters Hill Local Environmental Plan 2012* (LEP), in particular 'to maintain and enhance the character and identity of established neighbourhoods'.

However, the Trust opposes the current Montefiore Seniors Living Planning Proposal (PP-2023-1109) in its present form for reasons set out in this submission.

The Trust is firstly concerned that the process undertaken to progress the Planning Proposal to this stage has at best been untidy and has not adequately responded to recommendations made by Hunter's Hill Council (Council), Council's Local Planning Panel (LPP) and indeed the Hunters Hill community, given that community consultation to date has been largely limited to newsletters initially only distributed to part of the Boronia Park precinct closely surrounding the subject site and a community information session run by the proponent, where only 37 people attended.[1]

Appendix A of this submission provides a summary of the process undertaken to date.

The reasons for our objection to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal are summarised below:

The *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) will apply to development of this site and many of its provisions should be carefully considered at the Planning Proposal stage, including provisions relating to water and sewer, bush fire prone

[1] Urbis, *Montefiore Hunters Hill Planning Proposal: Community and stakeholder engagement outcomes report* (3 February 2023) 7 [3.3].

land, design of seniors housing and some non-discretionary development standards. The Planning Proposal proposes what the Housing SEPP and associated *Seniors Housing Design Guide*, which must be considered, would regard as high density development in a low density residential area. The 'Design principles for seniors housing' provided in Schedule 8 of the Housing SEPP, particularly relating to 'Neighbourhood amenity and streetscape', should be applied so that an amended LEP can deliver an acceptable medium density solution.

Bushfire Protection has not been considered holistically by a Strategic Bushfire Study that examines the application of Section 6.4 of 'Planning for Bushfire Protection 2019' across the entire site. The two south eastern lots, accommodating all of the 194 residential aged care beds in existing buildings 'exposed to a higher bushfire risk', have been excised from the Planning Proposal and are not given the same level of attention as the rest of the site. An updated Strategic Bushfire Study must indicate appropriate safe locations on the site for Residential Aged Care Facility (RACF) beds and for Independent Living Units (ILUs) to provide certainty about the site layout in a finalised Masterplan before approval of the Planning Proposal can be considered.

Rezoning Part of the Site to SP2 Infrastructure (Seniors Housing) is accepted as a logical means to provide some certainty about future uses. However, amendment of the LEP Land Use Table by adding 'community facility' and 'restaurant and café' to the uses 'Permitted with consent' for land zoned SP2 Infrastructure is rejected, as this would permit these additional uses of all land in the Municipality that is zoned SP2 Infrastructure, which would create unacceptable unintended consequences. **Proponent led Planning Proposals should not be permitted to amend LEP Land Use Tables. Even if the additional uses of 'community facility' and 'restaurant and café' were confined to SP2 zoned land within the Montefiore site, many community facilities and certainly restaurants would not be acceptable development in low density residential areas like Barons Crescent or Gaza Avenue.**

The Community Needs Assessment (CNA) was criticised in a Report to Hunter's Hill Council in September 2023 for not establishing that the dwelling mix proposed will meet the demand for housing that is more diverse and affordable, to demonstrate the merit of the Planning Proposal. The CNA has not been revised since May 2023 so that it does not consider the changes brought about by the Alteration of Gateway Determination made on 7 November 2025 and in particular the change in use of the proposed Building B from ILUs to a mix of ancillary uses. **The Trust takes the view that the proposed ultimate mix of housing that is to be provided must be examined and guided by a reliable and up to date independent community needs analysis.**

The proposed Building B remains a four storey building which appears to be very large if it is no longer to house ILUs but is instead used for development that is genuinely 'ordinarily incidental or ancillary' to seniors housing, even if that includes staff housing. This in combination with the unacceptable impact of four storey development immediately opposite one and two storey residential development that is set in bushland, leads to the logical conclusion that **the proposed Building B should be of a smaller scale, we would recommend two storey with a maximum height of 8.5 metres.**

Building Heights proposed by the Planning Proposal are generally too high. While we agree with the maximum building height of 8.5 metres in Gaza Avenue, we provide sound reasons to also limit the height of the proposed Building B to 8.5 metres and note that the 16 metre building height for Building A proposed to replace existing development, including two small

cottages in Barons Crescent near the corner of Gaza Avenue, will have a devastating impact on the streetscape and character of the area – refer to Figure 2 below. We therefore recommend that all buildings near the perimeter of the site have a maximum building height of 8.5 metres. Additionally, the 24 metre building height for the proposed six storey Buildings C and D in the middle of the site do not accord with the objectives of the *Seniors Housing Design Guide* for Independent living for medium density, in relation to neighbourhood amenity and streetscape. We therefore recommend that, as the proposed Buildings C and D are some distance from the perimeter of the site, four storey buildings with a maximum height of 16 metres would be acceptable. Whatever heights are settled on for amendment of the LEP, it is essential that they do not provide significant margins for concept designs to expand to fill unutilised parts of the available building envelope at development application (DA) stage.

Site Floor Space Ratios (FSRs) that are in disparity with finally settled maximum heights need to be tightened up to prevent the risks of bulkier and heavier massing than is suggested in the *Site Specific Development Control Plan* and its Masterplan and these documents must be finalised rather than being 'indicative' before considering approval of this Planning Proposal.

A Conservation Management Plan to assess the whole site, as recommended by Hunter's Hill Council's Local Planning Panel, is essential to guide the treatment and management of impacts on items of heritage significance throughout this project and should be prepared by an independent heritage expert.

The Traffic Impact Assessment (TIA) prepared by Urbis is based on out of date vehicle counts that were taken at a time when traffic flows were still reduced by COVID and does not include consideration of recent and future changes that will further increase vehicle counts. The TIA also selectively uses this data by excluding consideration of sections of nearby local road where traffic counts already exceed the environmental maximum capacity. There are other anomalies relating to how on-site parking requirements are assessed. **A reputable, properly qualified and independent traffic engineer should be appointed to prepare a new Transport Impact Assessment, starting with new traffic counts that truly reflect current traffic movements.**

The Sydney North Planning Panel (SNPP) that determined that the Planning Proposal should be submitted for Gateway determination was made up of three members, all State appointees. Future meeting of the SNPP that deal with this Planning Proposal must include a local panel member with a sound understanding of the character and identity of established neighbourhoods in Hunters Hill.

Detailed Submission

The Trust believes, given the deficiencies to date, it is essential that time is taken to address outstanding matters before considering approval of this Planning Proposal that, in its present form, will have unacceptable impacts in an environmentally sensitive part of Hunters Hill.

The discussion below deals with some of the matters the Trust believes must be addressed.

Firstly, some consideration of the roll of and relationship between the principal planning instruments is required.

State Environmental Planning Policy (Housing) 2021

State Environmental Planning Policy (Housing) 2021 (Housing SEPP) and specifically Chapter 3, Part 5 applies to housing for seniors and people with a disability and prevails over other planning instruments, because s 8 (1) of the Housing SEPP provides:

> Unless otherwise specified in this Policy, if there is an inconsistency between this Policy and another environmental planning instrument, whether made before or after the commencement of this Policy, this Policy prevails to the extent of the inconsistency.

In relation to 'Design of seniors housing', s 97 of the Housing SEPP provides:

(1) In determining a development application for development for the purposes of seniors housing, a consent authority **must consider the *Seniors Housing Design Guide***, published by the Department in December 2023.

(2) **Development consent must not be granted to development for the purposes of seniors housing unless the consent authority is satisfied the design of the seniors housing demonstrates that adequate consideration has been given to the design principles for seniors housing set out in Schedule 8.** (Emphasis added)

The first of the 'Design principles for seniors housing' provided in Schedule 8 are:

1 Neighbourhood amenity and streetscape

Seniors housing should be designed as follows—

(a) to recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation,

(b) **to recognise the desirable elements of—**

(i) the location's current character, or

(ii) for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area,

(c) **to complement heritage conservation areas and heritage items in the area**,

(d) **to maintain reasonable neighbourhood amenity and appropriate residential character by—**

(i) providing building setbacks to reduce bulk and overshadowing, and

(ii) using building form and siting that relates to the site's land form, and

(iii) **adopting building heights at the street frontage that are compatible in scale with adjacent buildings,** and

(iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours,

(e) to set back the front building on the site generally in line with the existing building line,

(f) to include plants reasonably similar to other plants in the street,

(g) to retain, wherever reasonable, significant trees,

(h) to prevent the construction of a building in a riparian zone.

(Emphasis added)

The above 'Design principles for seniors housing' are entirely consistent with the other principal planning instrument that applies to the site, being the *Hunters Hill Local Environmental Plan 2012* (LEP), which this Planning Proposal seeks to amend.

Although compliance with many of the provisions of the Housing SEPP and associated *Seniors Housing Design Guide* can be left for consideration at development application (DA) stage, it is essential that compliance with some provisions are considered at Planning Proposal stage, including: s 88 Restrictions on occupation of seniors housing; s 95 Water and sewer; s 96 Bush fire prone land; s 97 Design of seniors housing; and some of the non-discretionary development standards of ss 107 and 108.

Importantly, any amendment to the LEP proposed by the Planning Proposal must not attempt to derogate from the provisions of the Housing SEPP.

Bushfire Protection

In attempting to satisfy Condition 1(a) of the Gateway Determination, relating to bushfire protection, the proponent's principal response has been to: firstly excise from the Planning Proposal the south eastern lots of the site, where the 194 RACF beds proposed to be retained are located; and secondly to change the use of the proposed Building B from independent living units (ILUs) to a mix of ancillary uses.

The SIX Maps image in Figure 1 below shows Category 1 vegetation near the southern boundary of Lots 9 and 10 in Deposited Plan 724017. These lots have been excised from the Planning Proposal and are where the 194 RACF beds proposed to be retained are located.

Figure 1: Category 1 vegetation near the southern boundary of Lots 9 and 10 in Deposited Plan 724017. These lots have been excised from the Planning Proposal and are where the 194 RACF beds proposed to be retained are located.
[Source: SIX Maps]

We do not accept that the excision the south eastern lots of the site from the Planning Proposal assists satisfying Condition 1(a) in relation to demonstrating the ability to achieve compliance with the relevant performance criteria in Section 6.4 of 'Planning for Bushfire Protection 2019'. Section 6.4 applies 'In circumstances where new building projects within existing SFPP [Special fire protection purpose] developments are proposed',[2] regardless of whether there is a Planning Proposal. Accordingly, Section 6.4 must be applied across the entire site. This aligns with the Trust's view that bushfire protection must be considered holistically, including consideration of impacts on the surrounding neighbourhood, including both residential development and surrounding bushland.

[2] NSW Rural Fire Service, *Planning for Bush Fire Protection: A guide for councils, planners, fire authorities and developers*, (November 2019) <https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0005/174272/Planning-for-Bush-Fire-Protection-2019.pdf> 52 [6.4].

One of the objectives of Section 6.4 that applies to existing SFPP development is to 'provide a better bush fire protection outcome for existing buildings'.[3] However, in relation to existing buildings very close to the southern boundary and housing RACF beds, the Blackash *Strategic Bushfire Study* appears to rely principally on Montefiore continuing to mitigate risks on its own land and working collaboratively with authorities to reduce risk with some reliance placed on the *Hunters Hill Lane Cove Parramatta Ryde Bushfire Risk Management Committee Bushfire Risk Management Plan 2019 – 2024* designating an asset protection zone [APZ] along the southern interface of the site.[4]

It is noted that Section 3.2.5 of 'Planning for Bushfire Protection 2019' provides:

> In order to guarantee that an APZ can be managed in perpetuity, APZs should be contained within the overall development site and not on adjoining lands.

The risk of bushfire to the proposed Building B from Category 2 vegetation on the opposite side of Barons Crescent has apparently caused the use of this building to change from ILUs to a mix of ancillary uses. On the other hand, the risk of bushfire to buildings near the southern boundary of the site from more hazardous Category 1 vegetation on the opposite side of a footpath has not triggered reconsideration of the use of these buildings for RACF accommodation.

The Trust is concerned about the anomaly between the application of modern standards preventing the occupation of Building B by ILU residents while the more at-risk less physically able RACF residents, who will be more difficult to relocate, can be accommodated in existing buildings 'exposed to a higher bushfire risk'.[5]

An updated Strategic Bushfire Study must indicate appropriate safe locations on the site for Residential Aged Care Facility (RACF) beds and for Independent Living Units (ILUs) to provide certainty about the site layout in a finalised Masterplan before approval of the Planning Proposal can be considered for approval.

Rezoning Part of Site to SP2 Infrastructure (Seniors Housing)

The Trust accepts the logic of rezoning the part of the site where the Planning Proposal applies to SP2 Infrastructure (Seniors Housing), to provide some certainty.

However, **the Trust completely rejects the proposal to amend the LEP Land Use Table by adding 'community facility' and 'restaurant and café' to the uses 'Permitted with consent' for land zoned SP2 Infrastructure**, as proposed at page 35 [7.2] of the Planning Proposal. **Amending the LEP Land Use Table in this way would permit the uses of 'community facility' and 'restaurant and café' with consent, on all land in the Municipality that is zoned SP2 Infrastructure, which would create unacceptable unintended consequences.**

Proponent led Planning Proposals should not be permitted to amend LEP Land Use Tables – this is a matter for Councils.

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3 Ibid.

4 Blackash Bushfire Consulting, *Strategic Bushfire Study Sir Moses Montefiore Jewish Home 116-120 High street, 2-20 Gaza Avenue and 45-47 Barons Crescent, Hunters Hill* (30 September 2025), 19.

5 Ibid.

Even if the additional uses of 'community facility' and 'restaurant and café' were confined to SP2 zoned land within the Montefiore site, many community facilities and certainly restaurants would not be acceptable development in low density residential areas like Barons Crescent or Gaza Avenue.

SP2 Infrastructure (Seniors Housing) zoning creates some uncertainty about what is 'ordinarily incidental or ancillary' to seniors housing. Ideally, this should be clarified to ensure genuinely incidental or ancillary development like a small scale café, occupying a limited area that is largely used by residents, staff and visitors is permitted. On the other hand, development that is less incidental or ancillary to seniors housing such as a medical suite, greater than a limited area that would attract significant clientele with no other reason to visit the site, should not be permitted because it would be entirely inappropriate in residential cul-de-sacs.

There are ways to create greater certainty about what development is permitted, including adding very specific additional permitted uses to Schedule 1 of the LEP, such as:

> Development for the purposes of up to three cafés, each with a total floor area that does not exceed 30m², is permitted with development consent.

Alternatively, although not as legally binding as adding very specific additional permitted uses to Schedule 1 of the LEP, additional uses could be dealt with in the *Site Specific DCP* but to provide certainty, the *Site Specific DCP* would need to be a finalised document, not the indicative document that it currently is, before the Planning Proposal is considered for approval.

Community Needs Assessment

The Planning Proposal refers to its Appendix G as the 'Social Impact Report'. The Appendix G available with the material on public exhibition is headed 'Community Need Assessment' and is dated 25 May 2023.

With respect to the *Community Needs Assessment* (CNA), the report to Hunter's Hill Council's Extraordinary Meeting of 12 September 2023 was clear that, in order to establish strategic and site specific merit, the CNA needed to demonstrate:

> That the dwelling mix proposed by the Planning Proposal will meet the demand for housing that is more diverse and affordable[6] [and]
>
> that potential social impacts can be readily addressed during the subsequent LEP making stages.[7]

Although there is some discussion of Social Infrastructure in the body of the Planning Proposal itself, there is no 'Social Impact Report' on public exhibition so that any negative social impacts are not considered. The CNA has not been revised since May 2023 so that it does not consider the changes brought about by the Alteration of Gateway Determination made on 7 November 2025 and in particular the change in use of the proposed Building B from ILUs to a mix of ancillary uses. Consequently, there is little if any consideration of the

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6 Hunter's Hill Council, *Extraordinary Meeting No 4524* (12 September 2023) <https://huntershill.infocouncil.biz/Open/2023/09/OC_20230912_AGN_1841_AT_EXTRA.PDF>, 14.

7 Ibid 15.

social impacts of the ancillary uses of Building B to allow these to be addressed during the LEP making stages.

It would appear that the dwelling mix proposed by the Planning Proposal is now being driven by where ILUs can be located to satisfy Condition 1(a) of the Gateway Determination rather than by any community needs analysis. Furthermore, there appears to be no consideration of affordable housing, although it is accepted that including staff accommodation in Building B might be regarded in this light, provided that it is affordable.

Any development of this site should be in accordance with *State Environmental Planning Policy (Housing) 2021*, Chapter 3, Part 5 Housing for seniors and people with a disability, which defines seniors to include 'people who are at least 60 years of age'.[8] This would result in ILUs normally having at least one resident of at least 60 years of age (rather than the earlier proposed 55 years), which would have a number of advantages, including reducing demand for the now reduced number of ILUs and a likely reduction in traffic movements with slightly older residents less likely to travel to a place of employment.

There has been considerable community angst about the loss of aged care beds to make way for 'luxurious' ILUs.[9] However, **the Trust takes the view that the proposed ultimate mix of housing that is to be provided must be examined and guided by a reliable and up to date independent community needs analysis.**

Given the limited community consultation to date, it is also important that greater community input is sought in updating the community needs analysis.

Building B

The proposed Building B remains a four storey building with a gross floor area of 3197 m², which appears to be extraordinarily large in scale if it is no longer to house ILUs but is instead used for development that is 'ordinarily incidental or ancillary' to seniors housing as permitted by the proposed SP2 Infrastructure (Seniors Housing) zoning and we have already made a strong case that SP2 Infrastructure uses cannot be extended by adding 'community facility' and 'restaurant and café', particularly if this involves amending the Land Use Table.

There has also been discussion of **extending the use of Building B to accommodate others beyond seniors, those who cohabit with seniors and staff. We note that this cannot occur as it would subvert the provisions of s 88 of the Housing SEPP, relating to Restrictions on occupation of seniors housing.**

There is concern that a building of the scale of the proposed Building B, without ILUs, would struggle to attract sufficient development that is genuinely 'ordinarily incidental or ancillary' to seniors housing, even if staff accommodation is included. Despite the discussion above, a large building where limited uses are permitted, might see an attempt to accommodate businesses only having a loose connection with seniors housing, which would be inappropriate in a low density residential neighbourhood.

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8 *State Environmental Planning Policy (Housing) 2021*, s 82.

9 See, eg, Equity Development Management, *Montefiore Seniors Living Development Randwick, NSW*, (accessed 15 January 2026) <https://equitydm.com.au/montefiore-seniors-living-development-randwick-nsw/>.

This concern, combined with the unacceptable impact of four storey development immediately opposite one and two storey residential development that is set in bushland, leads to the logical conclusion that the proposed Building B should be of a smaller scale, we would recommend two storey with a maximum height of 8.5 metres.

Building Envelopes

The Trust shares the concerns of many about the height, bulk and scale of development that could be permitted, should this Planning Proposal be approved as currently presented.

In line with the aims of the current LEP, the tree lined streetscapes and the amenity of low density residential development, set not just in gardens but in bushland in this environmentally sensitive part of Hunters Hill, must remain protected by an LEP that prevents the encroachment of buildings of excessive height, bulk and scale near low density residential housing.

Building Heights

Good planning also dictates that there should be gradual transitions in building heights not abrupt changes as will occur if four storey development is permitted adjacent to the perimeter of the site, even with increased setbacks.

This principle is reflected in the Housing SEPP Schedule 8 'Design principles for seniors housing' 1 (d) (iii) of 'adopting building heights at the street frontage that are compatible in scale with adjacent buildings'.

The Trust supports the proposed maximum height of 8.5 metres in Gaza Avenue but does not accept that Barons Crescent should be treated any differently just because it is a wider street with more trees. One and two storey residential development opposite the site in Barons Crescent, particularly those with street frontages (as distinct from battle axe blocks), will be unacceptably impacted by four story development, even with a 10 metre setback, increasing to 13 metres at higher levels.

With a maximum building height of 8.5 metres in Gaza Avenue and sound reasons to also limit the height of the proposed Building B to 8.5 metres, the proposed Building A on the corner of Barons Crescent and Gaza Avenue is the only other proposed building near the perimeter of the site to be considered.

The photograph in Figure 2 below shows the existing single storey cottage on the corner of Barons Crescent and Gaza Avenue. The replacement of this cottage with a four story building, even with greater setbacks and articulation, will have a devastating impact on the streetscape and character of the area.

Figure 2: Single storey cottage on the corner of Barons Crescent and Gaza Avenue. The replacement of this cottage with a four story building, even with greater setbacks and articulation, will have a devastating impact on the streetscape and character of the area.

For the reasons given above, **the Trust is firmly of the view that the maximum building height of all buildings adjacent to the perimeter of the site must remain at the present maximum building height of 8.5 metres.**

As discussed above, development of this site must be in accordance with *State Environmental Planning Policy (Housing) 2021*, Chapter 3, Part 5 Housing for seniors and people with a disability and be medium density in scale. It is noted that the design principles in the associated *Seniors Housing Design Guide* for Independent living for medium density, in relation to neighbourhood amenity and streetscape, have the objectives:

> To provide two or three storey housing clusters where the scale and massing is articulated and separated to respect the character and pattern of the suburban surroundings.
>
> To positively enhance the streetscape and uplift the quality of built form in the neighbourhood, and provide a landscape buffer to soften the development.[10]

[10] NSW Planning & Environment, *Seniors Housing Design Guide*, (November 2023) <https://www.planning.nsw.gov.au/sites/default/files/2023-07/seniors-housing-design-guide.pdf> 101 [15.1.1]-[15.1.2].

Clearly, the proposed six storey Buildings C and D in the middle of the site do not align with these objectives and should be reduced to no more than four storeys with a maximum building height of 16 metres.

The report to Hunter's Hill Council's Extraordinary Meeting of 12 September 2023 raised the prospect of:

> The disparity between the maximum heights and floor space ratio (FSR) versus the number of storeys and actual gross floor area (GFA) of the reference scheme open up risks of taller, bulkier and heavier massing …[11]

It is noted that, the maximum building heights proposed in the Planning Proposal exceed by significant margins the building heights shown in the proponent's *Urban Design Report*, which shows a concept design.[12]

Whatever heights are settled on for amendment of the LEP, it is essential that they do not provide significant margins for concept designs to expand to fill unutilised parts of the available building envelope at DA stage.

Floor Space Ratio (FSR)

There are also concerns regarding the proposed floor space ratio (FSR) of 1:1 across the entire site. FSR calculations on page 31 of the *Urban Design Report* reveal that the concept designs only require an FSR of 0.83:1 so there is potential for bulkier designs to be submitted at DA stage.

When building heights are settled, FSR calculations similar to those included in the *Urban Design Report* should be prepared to establish an FSR to ensure the amended LEP will prevent excessively bulky buildings and leave appropriate open space for tree preservation and the enjoyment of residents and visitors.

Masterplan within the *Site Specific DCP*

It is also noted that the Masterplan within the *Site Specific DCP* is only indicative. The *Site Specific DCP* and Masterplan should be finalised to provide some certainty about the kind of development the Planning Proposal might enable.

As Councils are the body that usually adopts development control plans, Council must be involved in the development and approval of any *Site Specific DCP*.

Heritage

At its meeting on 22 June 2023, the Hunter's Hill Local Planning Panel (LPP), although only in an advisory capacity, among other things resolved unanimously that:

> A conservation plan to assess the whole site including the garden and synagogue be prepared by an independent heritage expert …

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11 Hunter's Hill Council, above n 6, 21.

12 Jackson Teece, *Strategic Planning Proposal Urban Design Report* (October 2025) 13 [2.2].

Instead, the proponents have continued to rely on the report *Heritage Assessment & Opportunities & Constraints: Montefiore Hunters Hill* (Urbis Heritage Report), of November 2021, which having been prepared by Urbis is not independent.

However, the Trust supports the Urbis Heritage Report's Assessment of Significance that:

> The Montefiore Garden has local heritage significance at a historical, aesthetic, social and representative level.[13]

The Trust, with some concern, accepts the Urbis Heritage Report's Assessment of Significance that:

> The Cyril Rosenbaum Synagogue … is considered to have low Local heritage significance for its associative and social significance and possibly some aesthetic significance …[14]

Although the proposed *Site Specific DCP* includes the extant Synagogue, there appears to have been consideration of its demolition or relocation. It is noted that the Planning Proposal, with a Masterplan that is only 'indicative', leaves open the possibility of future DAs including demolition or relocation of the Synagogue.

Not mentioned in the Urbis Heritage Report, is the World War II communications bunker located to the west of the Montefiore Garden.

The Trust would not support the demolition or relocation of the Synagogue or any disturbance of the World War II communications bunker, in the absence of a conservation management plan providing sound reasons for such actions.

The Trust again stresses the importance of preparation of a conservation management plan prepared by an independent heritage expert, as recommended by the LPP, to guide the ongoing development of the site in a manner that respects heritage significance.

Traffic Management

Presently nearly all vehicular access to the current facility is via High Street. The eastern end of High Street beyond Gaza Avenue, being a dead end is only used for vehicular access to the Montefiore site and to some parking near the Boronia Park North Playground. Boronia Park Reserve occupies all land to the south of this section of High Street. This arrangement minimises the impact of traffic movements in and out of the site on the surrounding neighbourhood.

The proposal for additional vehicular access to both underground parking and loading docks from Barons Crescent is not supported as this would introduce additional traffic movements, including heavy delivery and service vehicle movements, into a quiet residential cul-de-sac. The proposed turning bay, to allow forward-in and forward-out movements for all service and delivery vehicles accessing the site, should be located underground and accessed only from the existing driveways off High Street.

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[13] Urbis, *Heritage Assessment & Opportunities & Constraints: Montefiore Hunters Hill* (November 2021) 51 [6.3.3].

[14] Ibid 55 [6.4].

With respect to the *Montefiore Hunters Hill Planning Proposal – Transport Impact Assessment* (TIA), firstly there is concern that it is based on traffic volumes collected for the *Boronia Park Precinct Draft Local Area Traffic Management Plan* (LATMP), which was completed in June 2021, at a time when traffic volumes were significantly impacted by COVID.

Secondly, the traffic volumes collected will not reflect traffic volumes generated by the Boronia Park Sports and Community Facility, the construction of which had not even commenced at the time data was collected for the LATMP.

Thirdly, Hunter's Hill Council has recently moved a large part of its works depot and functions of its works office into new or restored facilities within Boronia Park Reserve, meaning many of the movements of Council vehicles and equipment and the vehicles of some employees is now through the Boronia Park precinct.

Fourthly, the TIA makes no allowance for the future impact on traffic generated by future development in the Boronia Park precinct that will be permitted under the NSW Government's *Low and Mid-Rise Housing Policy* which came into effect early in 2025.

Fifthly, the TIA uses information from LATMP selectively, ignoring that even in the COVID impacted times of the LATMP the weekday morning peak hour traffic volumes in the section of High Street between Blaxland Street and Pittwater Road already exceeded the environmental maximum capacity standard for local roads of 300 vehicles per hour.[15] Refer to Figure 3 below.

[15] Urbis, *Montefiore Hunters Hill Planning Proposal – Transport Impact Assessment* (30 September 2025) 11 [2.3.4] cf ptc., *Boronia Park Precinct Draft Local Area Traffic Management Plan* (15 June 2021) <https://ehq-production-australia.s3.ap-southeast-2.amazonaws.com/087a012b129707cc0c32eae74dcdbda4304bb5a5/original/1715583984/a4d0ceef480ab2931b27d228b5504a27_ptc.-Boronia-Park-Precinct-Draft-LATMS-June2021.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIII4DU7AG%2F20260113%2Fap-southeast-2%2Fs3%2Faws4_request&X-Amz-Date=20260113T025558Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=7d306c770f1a1ccfda28c1b0d3d68c3ea1ba5ca6c2ec42d18dbf9accb2d2e416> 11, 13 [3.2].

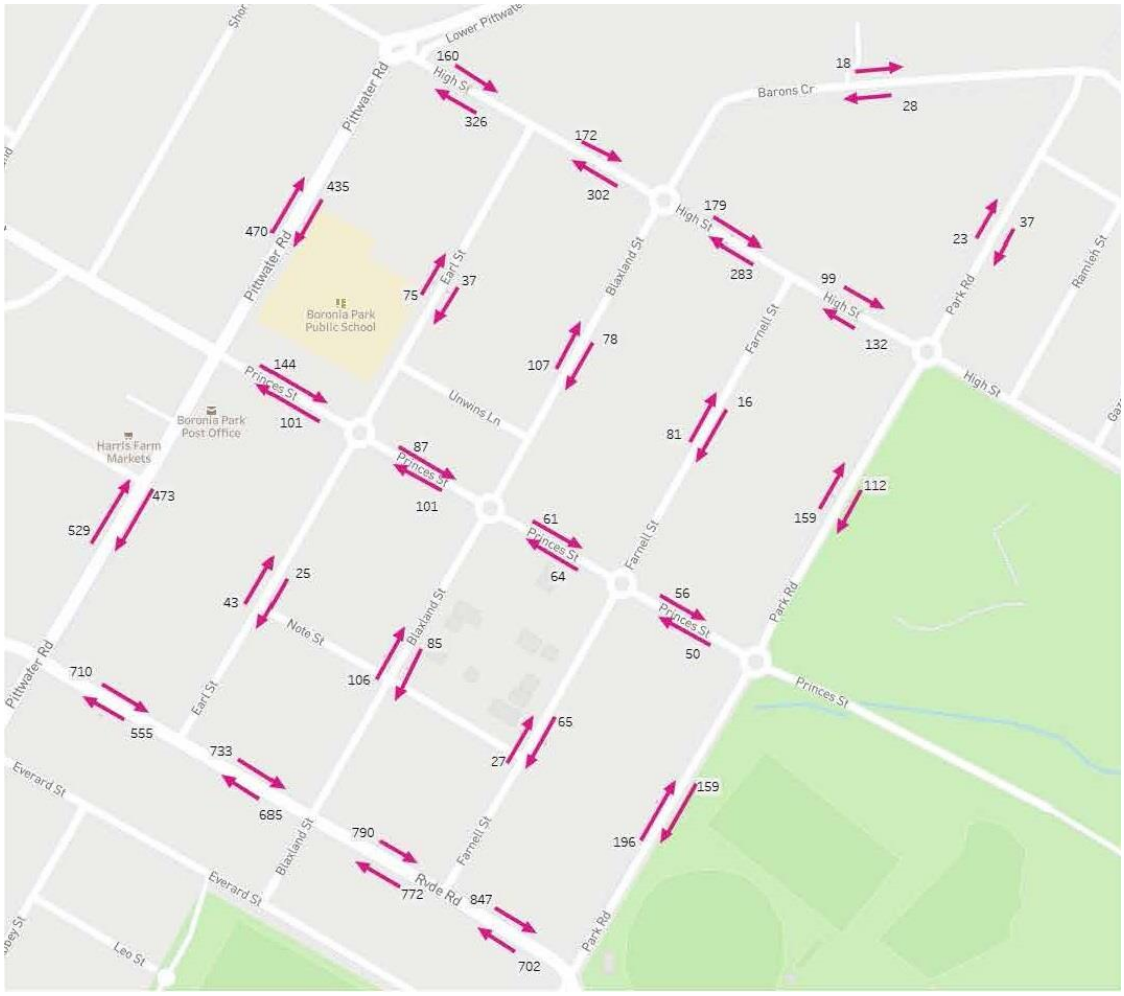

Figure 3: Weekday morning peak hour traffic volumes show that, even in the COVID impacted times of the LATMP, the weekday morning peak hour traffic volumes in the section of High Street between Blaxland Street and Pittwater Road already exceeded the environmental maximum capacity standard for local roads of 300 vehicles per hour. [Source: ptc., *Boronia Park Precinct Draft Local Area Traffic Management Plan* (15 June 2021) p 11 Figure 5.]

These weekday morning peak hour traffic volumes will largely coincide with 9:00 am shift changeover time when the largest number of staff will be arriving at and departing from the site, with those travelling to or from the north or west most likely to travel on High Street between the site and Pittwater Road, with additional staff adding to vehicular movements on a road where the environmental maximum capacity standard for local roads is already exceeded. This will be further exacerbated with the additional movements of ILU residents, many of whom will be very capable of driving themselves to their place of employment or out for other daily activities.

There are other anomalies with the TIA, including:

> The number of ILUs in the proposed Buildings A, C and D is stated to be 112 and this number appears to be used in most analysis but there appears, as far as it is possible to see, no allowance for ILUs in the proposed buildings along Gaza Avenue.
>
> Table 3 proposes a breakdown of car parking, allocating 30 car parking spaces for RACF staff while Table 5 anticipates staffing levels up to 73 across all staff, however

the non-discretionary development standards for hostels and residential care of the Housing SEPP require at least '1 parking space for every 2 employees who are on duty at the same time.'[16] Given the paucity of the TIA, there appears to be no justification for allowing non-compliance of this non-discretionary development standard under s 4.15 (3) of the *Environmental Planning and Assessment Act 1979*.

It would appear there are substantial deficiencies with the TIA, both in terms of assessing the number of on-site parking spaces required and assessing the impact on local roads in the Boronia Park precinct that we do not believe have sufficient capacity to cope with the additional traffic, which will be generated by development of the scale proposed in this Planning Proposal.

It is essential that an up to date Transport Impact Assessment that properly considers the matters raised above, as well as matters raised in other submissions, be prepared before this Planning Proposal progresses further. To achieve this, a reputable, properly qualified and independent traffic engineer should be appointed to prepare a new Transport Impact Assessment, starting with new traffic counts that truly reflect current traffic movements.

Impacts must not be Considered in Isolation

Above, in relation to fire protection, we expressed concern about the more at-risk less physically able RACF residents, who will be more difficult to relocate, being located in buildings 'exposed to a higher bushfire risk'.

In relation to traffic management, we have also identified substantial deficiencies with the TIA.

In the event of a bushfire, it will certainly be necessary to provide access for firefighting appliances and it may also be necessary to evacuate some senior residents from the site.

The impact of possible traffic congestion on these emergency traffic movements must be analysed and viable solutions explained.

Independence of Supporting Material

We note that as well as preparing the Planning Proposal, Urbis prepared seven of the 14 Appendices that the Planning Proposal relies on.

Although the Planning Proposal and the seven Appendices prepared by Urbis provide the names of the authors and their positions in the organisation, only two of the Appendices provide any details of the qualifications the authors that give them the expertise to prepare such material.

A number of the documents are dated having been prepared before significant changes were made to the Planning Proposal so that the impacts of these changes are not considered.

The *Transport Impact Assessment*, in particular, is based on out of date vehicle counts that were taken at a time when traffic flows were still reduced by COVID and does not include consideration of recent and future changes that will further increase vehicle counts. The TIA

[16] *State Environmental Planning Policy (Housing) 2021*, s 107 (2) (i).

also selectively uses this data by excluding consideration of sections of a nearby local road where traffic counts already exceed the environmental maximum capacity.

We strongly recommend that a number of the supporting documents be replaced by up to date reports prepared by appropriately qualified independent experts, detailing their qualifications and experience in preparing such material.

Composition of Sydney North Planning Panel

Hunter's Hill Council's Sydney North Planning Panel (SNPP) representatives David Logan and Barry Buffier were excluded from the Sydney North Planning Panel that met on 18 December 2023, resulting in the Panel of three all being State appointees. At this meeting it was determined that the Planning Proposal should be submitted for Gateway determination.

The Trust recommends that any future meeting of the SNPP that deals with this Planning Proposal must include a local panel member with a sound understanding of the character and identity of established neighbourhoods in Hunters Hill.

Conclusion and Recommendations

Fair assessment of this complex Planning Proposal demands that supporting material be up to date and reliable. This submission has identified numerous deficiencies in supporting material. The next step must be for the proponent to appoint independent appropriately qualified experts to update or, in some cases, replace material that this Planning Proposal relies on.

This submission also makes recommendations about the avoidance or mitigation of impacts that are likely to occur if the Planning Proposal is approved as currently presented. These impacts include: bushfire risks; traffic congestion; zoning permitting inappropriate uses that will exacerbate traffic and parking issues in cul-de-sacs that serve low density residential development; and the impact of four and six storey development on the streetscape and character of the area.

The level of these impacts makes clear that development that will be permitted should this Planning Proposal be approved is simply too large in scale.

The analysis presented in this submission affirms the long held position of the Trust that the development of the Montefiore Hunters Hill site for expanded seniors housing should be medium density in scale.

We hope this submission will assist in finding solutions that will deliver a medium density co-located care facility incorporating an appropriate blend of both residential aged care and seniors independent living at the Montefiore site in Hunters Hill, consistently with the aims of the *Hunters Hill Local Environmental Plan 2012*, and in particular 'to maintain and enhance the character and identity of established neighbourhoods'.

Appendix A

Summary of the Process Undertaken to Date

Rejection of Initial Planning Proposal Lodgement

The Montefiore Planning Proposal was initially lodged in February 2023 but was rejected because there was no pre-lodgement meeting and no scoping study. Following rectification of these defects, lodgement of the Planning Proposal was accepted by Hunter's Hill Council in May 2023.

Local Planning Panel Meeting held on 22 June 2023

Council took little time to prepare a report to its Local Planning Panel, which on 22 June 2023 unanimously resolved:

1. That the Local Planning Panel does not support sending the Planning Proposal to Gateway Determination.
2. That the Local Planning Panel provides the following advice to Council:
    i. Preliminary analysis of technical reports is required;
    ii. Adequate time for assessment of the Proposal by the Local Planning Panel is needed;
    iii. There is a need for contextual understanding of the impacts of similar aged care sites within the Municipality;
    iv. A conservation plan to assess the whole site including the garden and synagogue be prepared by an independent heritage expert;
    v. The Panel recommends wider community consultation prior to gateway determination, including providing information on the process of a Planning Proposal and gateway determination.

Council Ordinary Meeting held on 26 June 2023

At its Ordinary Meeting held on 26 June 2023, Hunter's Hill Council considered as a Late Item a report on the Montefiore Planning Proposal, resolving among other things 'That further review and detailed assessment of [11] technical reports supporting the Planning Proposal be undertaken'.

Early Plan Changes

As recorded in a report to the Extraordinary Meeting of Hunter's Hill Council held on 12 September 2023, the Planning Proposal was amended in relation to:

- Height: A reduction in the numerical maximum building height standard from: - 26m to 24m in centre of the site. - 18m to 16m in northern part of site.
- Setbacks: An increase in building setback from the boundary adjacent to Barons Crescent from: - 7m to 10m at lower levels (ground, first and second level). - 10m to 13m at the top level.

- Roof level - Insertion of a new roof-top service equipment control within the Draft Site-specific Development Control Plan (Draft DCP) to restrict roof-top plant to 25% of the roof plane.
- Land Use Mix - Clarification regarding the proposed land use mix of residential aged care facilities (RACF) and independent living units (ILUs) for the purposes of assessing the proposal.[17]

Extraordinary Meeting of Council held on 12 September 2023

Although recommending that Hunter's Hill Council forward the Montefiore Planning Proposal to the Department of Planning and Environment seeking a Gateway Determination, even with the above amendments, the summary of findings from review and detailed assessment of technical reports, in the report to Council's Extraordinary Meeting held on 12 September 2023, was critical of the Proposal in many respects, including:

With respect to the Arboricultural Assessment and Landscape, that:

> There is concern regarding the increase in maximum building height from the current 8.5m to 16m and 24m on the amenity of the surrounding residential areas …
>
> The Preliminary Assessment does not provide a detailed assessment of the impact of the proposed works on the site's tree population. An Arboricultural Impact Assessment & Tree Protection Plan should be prepared as detailed within the review.[18]
>
> …
>
> Any impact to the existing trees due to bushfire requirements must be addressed within the Arboricultural Impact Assessment.[19]

With respect to the Bushfire Assessment, that:

> The development, in its current format cannot achieve full compliance with the general provisions for SFPP [Special Fire Protection Purpose] development, however, it is likely that full compliance to all Bushfire Protection Measures on such a proposal will not be practically achievable, and that some variations to these measures could be appropriately considered.[20]

With respect to the Community Needs Assessment (CNA) and Strategic Merit, that:

> The CNA report should have set out to establish the following points, to demonstrate the merit of the planning proposal:
>
> 1. That the dwelling mix proposed by the Planning Proposal will meet the demand for housing that is more diverse and affordable.[21]
>
> …

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17 Hunter's Hill Council, *Extraordinary Meeting No 4524* (12 September 2023) <https://huntershill.infocouncil.biz/Open/2023/09/OC_20230912_AGN_1841_AT_EXTRA.PDF> 6-7.

18 Ibid 10.

19 Ibid 11.

20 Ibid 13.

21 Ibid 14.

With respect to the Community Needs Assessment (CNA) and Site Specific Merit, that:

> Consideration of Social Impacts by the Community Needs Assessment (CAN) [sic] - Few aspects of social impact have been considered by the Planning Proposal. Consequently, the Planning Proposal is unable to demonstrate that the proposal has merit, nor that potential social impacts can be readily addressed during the subsequent LEP making stages.
>
> We recommend that the Gateway Determination require that this issue be further examined prior to public exhibition.[22]

With respect to the Transport Impact Assessment, that:

> Supporting documents (parking report, construction traffic management plan and traffic impact study) addressing matters raised within the review document, must be submitted to Council for assessment before a decision on the Planning Proposal, either to support or refuse the development, can be made.[23]

With respect to the Urban Design Report, that:

> the documents that will guide future development are too simplistic and will not be sufficient to ensure quality outcomes.
>
> The disparity between the maximum heights and floor space ratio (FSR) versus the number of storeys and actual gross floor area (GFA) of the reference scheme open up risks of taller, bulkier and heavier massing than is suggested through the masterplan and the objectives and controls in the site-specific development control plan (SSDCP) need to be tightened up to prevent this as far as possible.[24]

At Extraordinary Meeting 4524 of Hunter's Hill Council held on 12 September 2023, Council resolved by a five votes to two majority 'That Council does not support the Montefiore Planning Proposal', for numerous reasons set out in the resolution, which is included at Appendix B of this submission.

Meeting of Sydney North Planning Panel held on 18 December 2023

Hunter's Hill Council's Sydney North Planning Panel representatives David Logan and Barry Buffier were excluded from the Sydney North Planning Panel that met on 18 December 2023, resulting in the Panel of three all being State appointees.

Despite the findings from the review and detailed assessment of technical reports in the report to Council and the reasons given by Council to not support the Planning Proposal, the Panel determined that the Planning Proposal should be submitted for Gateway determination.

Gateway Determination

On 23 April 2024, the Director at the Department of Planning, Housing and Infrastructure, as delegate of the Minister for Planning and Public Spaces, determined that an amendment to

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22 Ibid 15.

23 Ibid 20.

24 Ibid 21.

the *Hunters Hill Local Environmental Plan 2012* to rezone the site from R2 Low Density Residential to SP2 Infrastructure (Seniors Housing) and increase the maximum building height and the floor space ratio, should proceed subject to conditions including relating to bushfire protection and Integrating Land Use and Transport.

It is noted that the determination found that 'the planning proposal is categorised as complex as described in the *Local Environmental Plan Making Guideline*',[25] meaning that Hunter's Hill Council should have been given 115 days rather than the 90 days it had to review and assess the Planning Proposal. The additional 25 days could have been productively utilised to better address some of the shortcomings of the proposal discussed above.

Alteration of Gateway Determination

The original determination specified that 'The LEP should be completed on or before 5 May 2025.' It is noted that the time to complete the LEP lapsed six months before an Alteration of Gateway Determination was made on 7 November 2025.

The amended determination includes very significant changes with the excision of Deposited Plan 724017 Lots 9 and 10 in the south east corner of the site from the Planning Proposal. It is noted that these lots are occupied by the 194 Residential Aged Care Facility (RACF) beds it is proposed be retained. It is presumed these lots were excised from the proposal because the 'existing aged care building is exposed to a higher bushfire risk' being 'located adjacent to a large area of remnant Category 1 vegetation to the south, presenting a more significant bushfire hazard due to the extent and continuity of fuels',[26] making it more difficult to satisfy the conditioning of the earlier determination to:

> Carry out consultation with the NSW Rural fire Service (RFS) to inform the planning proposal so that it addresses the potential overall increase in occupancy numbers on the site and can demonstrate the ability to achieve compliance with the relevant performance criteria in Section 6.4 in 'Planning for Bushfire Protection 2019'.
>
> The planning proposal is to be updated to address the consistency with Section 9.1 Direction 4.3 Planning for Bushfire Protection and demonstrate justification for the planning proposal.[27]

The other substantial change that appears to have been brought about in response this conditioning of the Gateway Determination is:

> that Building B, which is affected by the Category 2 Brushfire Prone Land to the North East of the site has been reconfigured from independent living units to mix of ancillary uses, including administration, communal facilities and staff housing, to meet the APZ [Asset Protection Zone] setback requirements of the Planning for Bushfire Protection 2019 (PBP).[28]

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[25] Department of Planning, Housing and Infrastructure, *Gateway Determination Planning proposal (Department Ref: PP-2023-1109)* (23 April 2024) Condition 4(d).

[26] Blackash Bushfire Consulting, *Strategic Bushfire Study Sir Moses Montefiore Jewish Home 116-120 High street, 2-20 Gaza Avenue and 45-47 Barons Crescent, Hunters Hill* (30 September 2025) 19, 46.

[27] Department of Planning, Housing and Infrastructure, above n 25, Condition 1(a).

[28] Blackash Bushfire Consulting, above n 26, 11.

Appendix B

Resolution 179/23 of Hunter's Hill Council at Extraordinary Meeting 4524 held on 12 September 2023

Council resolved by a five votes to two majority:

That Council does not support the Montefiore Planning Proposal for the reasons set out below:

1. The Planning Proposal lacks strategic merit and fails to meet site-specific merit and meet relevant Government guidelines and community expectations:
2. The Hunters Hill Planning Panel highlighted inadequate community consultation and reports (*these remain significantly unaddressed*). The Local Planning Panel does not support sending the Planning Proposal to Gateway Determination.
3. The proposed building heights are too high and out of local character. The proposal needs to be far more moderate in scale and meet the standards of *SEPP (Housing)* Part 5 Housing for seniors and people with a disability.
4. There will be serious impacts for the local area from the current proposal, including:
    i. A significant increase in traffic in an area where Council's own *Boronia Park Precinct: Local Area Traffic Management Plan* found Key Issues, including: Rat running; Traffic speeds and irresponsible driving; Pedestrian safety; and Parking.
    ii. The site being in an isolated location away from major roads, transport and facilities.
    iii. The proposed entry to the underground carpark and Loading Dock in Barons Crescent will have impacts on houses opposite and surrounding area.
    iv. The proposed pedestrian entry near the Synagogue is likely to cause parking impacts in Barons Crescent.
5. An unprecedented rezoning of residential land to SP2 (Seniors Housing), will set a serious precedent for the Municipality of Hunter's Hill (and beyond) by allowing zoning and heights that are not consistent with the Hunters Hill LEP.
6. Residential zoning should be used as:
    i. The site does not have existing infrastructure of the kind which is contemplated by the SEPP (Infrastructure). Nor does the Planning

Proposal or subsequent development envisage that this will change. The existing and proposed use of the site is residential.

ii. The Planning Proposal seeks to avoid compliance with the SEPP (Housing) by characterising the site and its uses as something which they are not; namely infrastructure.

iii. Assessment must have regard to the planning principles including, here, the *SEPP (Housing)*.

7. The Proponent's right to redevelop is acknowledged, but the proposal must recognise the Design principles set out in Part 5 Division 6 of the *SEPP (Housing)*, including:

i. Neighbourhood amenity and streetscapes, including current character; heritage conservation; and

ii. Visual and acoustic privacy.

8. The Site Specific DCP is inadequate and will not apply if a future development application is State significant development.

9. Council has inadequate information to make a well-informed decision to progress the Planning Proposal. Council is of the view that the report by the Director of Town Planning highlights numerous issues with the Planning Proposal where important requirements are either not satisfied or not satisfied to an adequate standard. These issues must be addressed.

10. The Planning Proposal is not consistent with the requirements of Hunter's Hill

Future Transport Strategy 2056 being:

i. new development should ideally occur on the major trunk transit network; and

ii. new development should ideally occur in proximity to the local centres and transport hubs with the LGA.

11. Consultation with the community has been inadequate and not addressed since

i. Council's Resolution 249/22 RESOLVED That Council: 1. Receive and note the resolutions unanimously passed by the residents at the meeting as listed in the attachment to this report; and 2.Resolve that should Council form a view that the proposal have strategic merit Council hold a community consultation meeting at the Town Hall as soon as practicable and before submission by Council for gateway determination; and

ii. the Local Planning Panels advice. The Council's report states "… it is our opinion that the applicant has not adequately consulted the local community. A consideration should ensure that a broader range of community views are sought."

12. The Planning Proposal fails to meet key requirements which are a central part of the current Hunters Hill LEP. The LEP has a strategic outcome that is not met in the report “Neighbourhoods Reflect Local Character”.

13. That Council invite Montefiore to resubmit an alternative proposal consistent with a residential site zoning.

Submission Type

I am making a personal submission

Title

Mr

First Name

STUART

Family name

IRELAND

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

2111

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

live in Hunters Hill council and would like to comment on Planning Proposal PP-2023-1109.

I am very much in favour of new developments however I am against developments that are not in keeping with the surrounding neighbourhood in terms of height. Additionally, developments of this nature fail to introduce any form of landscaping and green space.

Also the development does not seem to be keeping in line with the need to create affordable housing - these will be very exclusive high-end expensive apartments.

I also feel that the scale of this will set a precedent for further developments will really change the fabric of Hunters Hill and the surrounding suburbs. There are lots of examples of lower rise medium density housing..

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

See submission attached

Submission to Sydney North Planning Panel – Montefiore Senior Living Proposal

I am a local Hunter Hill resident living in easy walking distance to the Montefiore Nursing Home. Further, my mother- in-law is a resident of that nursing home.

I note that the proposal seeks to rezone the site at 120 High Street from "R2 Low Density Residential" to "SP2 Infrastructure (Seniors Housing)". Key features include:

- **Construction:** Nine new buildings ranging from two to six storeys in height.
- **Capacity:** Addition of up to 144 independent living units for residents over 55.
- **Aged Care Changes:** A reduction in residential aged care beds from 334 down to 194.

My objections to this proposal are primarily focus on its scale, environmental impact, and potential to set a precedent for the region. My objections mirror concerns previously raised by the Hunters Hill Council, the Hunters Hill Trust, and local resident groups.

Planning and Strategic Precedent

- **Rezoning Concerns:** The proposal seeks to rezone land from residential to "SP2 Infrastructure (Seniors Housing)". This proposal is a misuse of the SP2 category to enable the developer to:
    - build high-density residential buildings in areas where they would otherwise be prohibited under the current R2 Low Density Residential zoning.
    - significant increase building height and the Floor Space Ratio (FSR) which will **far exceed** the local character.
    - obtain more commercial gains rather than genuine public infrastructure needs since it involves the a significant reduction of essential age care beds on the site (see below).
- **Dangerous Precedent:** The move to rezone residential land would “set a serious precedent” for the municipality by allowing zoning and heights inconsistent with the Hunters Hill Local Environment Plan. I note that approving this rezoning will set a precedent for seven other local aged care sites to seek similar high-density developments, fundamentally altering the entire LGA.

Loss of Essential Aged Care Beds

- **Shift to Luxury Living:** The plan replaces 334 residential aged care beds with up to 144 independent living units. The proposal reduces the existing aged-care beds from 334 to 194. The proposal reduces essential care capacity for the 85+ demographic preferring a focus on more on premium property development. We have an ageing population and I strongly submit that the demographic need for residential age care beds far exceed the need for additional luxury 2-3 bedroom residential apartments in the community.

Incompatibility with Local Character

- **Excessive Height:** The proposed buildings of up to six storeys (24 meters) are inconsistent with the low-rise, R2 low-density residential character of the surrounding area.
- **Aesthetic and Heritage Impact:** The development's "bulk and scale" and its potential to negatively impact the scenic quality and heritage conservation areas, particularly when viewed from nearby waterways or parklands.

Submission to Sydney North Planning Panel – Montefiore Senior Living Proposal

Traffic and Infrastructure Concerns

- **Congestion:** The proposal includes a large underground car park (over 260 spaces) with entrances on Barons Crescent and High Street. This will significantly increase traffic on local roads like Ryde Road and Pittwater Road, which are already under pressure.
- **Safety and Parking:** The proposed development will create potential issues with "rat running," increased traffic speeds, and a lack of pedestrian safety in the Boronia Park precinct.
- **Isolated Location:** The site is relatively isolated from major transport hubs and shopping facilities, which will lead to a higher reliance on private vehicles.

Conclusion

I recommend that the rezoning proposal at this site from R2 Low Density Residential to SP2 Infrastructure (Seniors Housing) **be rejected** for the reasons stated above. Any proposed redevelopment of this site should continue to comply with the existing R2 Low Density Residential zoning. Further the number of residential aged care beds should not be reduced in any redevelopment proposal.

Submission Type

I am making a personal submission

Title

Ms

First Name

Annette

Family name

Gallard

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

My submission is attached as an uploaded document.

To: Northern Sydney Planning Panel

Re: Montefiore Planning Proposal PP – 2023 - 1109

I am not opposed to medium density seniors housing on this site however I object to the Montefiore Planning Proposal on the following grounds:

- The scale and height of the proposal is out of keeping with the surrounding residential area;
- The impact of traffic on the surrounding streets has not been properly measured;
- The development adds to the risks from bushfire for vulnerable residents;
- Lack of up to date and independent reports on matters such as heritage, traffic and community needs assessment;
- The poorly managed process of consultation so far including the omission of changes required by Council when the proposal was initially submitted to them.

1. **The Scale and Height of the Proposal**

The proposal as it currently stands involves some two storey and two four storey buildings on the perimeter of the site with a central core of two six storey buildings for independent living units with underground parking. The surrounding streets have a maximum of two storey residential housing. The maximum height of the buildings on the corner of Baron's Crescent and Gaza St and on Baron's Crescent to the south of the synagogue should also be two storeys ie. 8.5 meters.

This would not only be in keeping with the surrounding development it would be comply with State Environmental Planning Policy (Housing) 2021, Chapter 3 Part 5 Housing for seniors and for people with a disability which requires housing to be in two to three storey clusters. While this height limit should also apply to the currently proposed six storey buildings at the centre of the site good planning sees buildings rising from the perimeter to the centre so three to four storeys could be more acceptable in this part of the site.

At this stage the proposal is ambiguous as to the final designs but it is important that whatever is approved in terms of floor space ratios does not allow creep in terms of the number of storeys or the bulk of the buildings ie the current proposal is for an FSR of 1:1 across the whole site but the concept designs only require an FSR of 0.83:1. Does this mean that if an FSR of 1:1 is approved, completely new concepts and designs will be submitted at DA stage?

There is some ambiguity as to the use of Building B in the concept plans. Originally this was to be used for seniors housing but is now designated as "ancillary services". It is extremely important that these ancillary services do not intrude upon the quiet residential nature of Baron's Crescent. Commercial premises such as restaurants or cafes open to the public, doctor's rooms, a pharmacy etc are not compatible with the current land uses and would add to problems that are likely with traffic to and from the site.

2. Traffic impacts from the proposal

It is regrettable that the proposal relies on a traffic study that was conducted in the middle of COVID in June 2021. Traffic volumes were significantly less during this period but even so it shows that many of the local roads were above capacity of 300 movements per hour. This Traffic study has not been updated. It is likely that the proposal will add significantly to traffic in local streets, not only from resident's vehicles from the planned 144 independent living units but also from larger vehicles servicing the site.

Since the 2021 Traffic Study conditions have changed around Boronia Park. Bus services have improved with the 506 and 252 buses running much more regularly (unfortunately the 538 bus which is the only one to service the area where Montefiore is located has not improved and only runs hourly for part of the day making it of little to use to residents of Montefiore). Council has moved its Works Depot to Boronia Park which means more movement by trucks and heavy equipment. Many single dwellings have been replaced by duplexes each with multiple cars and more are on the way with the Government's Low and Medium Density Housing Policy which covers Boronia Park up to and including Park Rd. Council's Boronia Park Sporting and Community Facility attracts park users for longer periods particularly on game days when rugby union, cricket, pickle ball or other sports are played.

At the very least a new Traffic Study completed by an independent consultant should be developed to understand the full impact of this proposal.

A further complication arises in the event of a bushfire. It is envisaged that many service vehicles will use the High St entrance to Montefiore, including presumably fire trucks should a fire occur in bushland adjacent and to the south of the proposal. This will have implications for the evacuation of residents in the aged care facility which has been excised from the proposal. As High St is a cul de sac the conflict between getting fire appliances in and residents out is likely to be a major problem.

3. The bushfire risks to vulnerable residents in the Aged Care Units

The risk of bushfire in this part of Boronia Park should not be underestimated. To the casual observer the excision of the Aged Care Beds from the rezoning request appears to be a response to the requirement to mitigate bushfire risks on the site. A single narrow footpath separates the building where the aged care beds are located from Category 1 bushland. The bushland extends continuously to surround Baron's Crescent behind the houses opposite the site to link up with the Lane Cove National Park at Buffalo Creek Reserve. This bushland is valued by bushwalkers but can be dangerous during fire season.

When the aged care facility was originally opened in 1958, bushfires would have been sporadic and a known risk but climate change has changed perceptions of the risks that need to be managed to prevent death and loss of property. It is unlikely that a residential aged care facility would be approved on this site in 2026.

The current site is only lightly populated so the evacuation of residents is not as difficult as it would be if this proposal were to go ahead. While the morality of maximising the value of the site at the expense of vulnerable residents in the aged care units is one for Montefiore to consider, the actual risk to residents surrounding the rezoned area is one that should be considered when weighing up the merits of this proposal.

4. **Lack of heritage and other independent assessments**

This proposal lacks an independent heritage assessment as required by the Local Planning Panel in June 2023, there is no community needs assessment to support the assertion that the appropriate mix of dwellings on the site is 194 aged care beds and 144 independent living units and there is no up to date independent traffic study. Instead, the Urbis proposal relies on studies developed in-house specifically to support approval of the proposal.

Council in September 2023 looking at an earlier version of this proposal requested a community needs assessment that demonstrated that the mix of housing would meet "demand that is more diverse and affordable" and that the proposed potential social impacts can be "readily addressed during the subsequent LEP making stages". This has not been forthcoming. Instead, the proposal will have no affordable housing, and the dwelling mix appears to be driven by the assessed capacity of the site.

As noted previously the base documents upon which the traffic impacts are assessed are reliant on an out-of-date traffic study conducted during a period of historically low traffic movements in Boronia Park.

It is noted that the lack of an independent heritage report means that the future of the synagogue while safe at this stage could be demolished in the future as it is seen as "having low local heritage significance".

It is not that Urbis has not been placed on notice previously about the need for **independent** expert advice. Rather Urbis has chosen to present selected in-house advice that supports the proposal.

5. **Poorly managed consultation process**

This proposal has surfaced periodically since 2022 when it was first mooted following the identification of the potential for Montefiore to provide seniors housing in Hunters Hill Council's Local Housing Study.

Multiple opportunities for improvement were identified when it was presented to Hunters Hill Council, the Local Planning Panel, the Gateway Process and in community consultations which were initially limited to residents who lived along Gaza St.

Each of these consultations and decision points represented opportunities to improve the proposal but it is notable that the only directions that appear to have been taken on

by the proponents involves the excision of the Aged Care facility from the proposed rezoning into SP2. None of the changes since represent a recognition of the siting of this proposal on the fringes of low-rise residential development and in the middle of sensitive bushland. The former would be expected to yield a proposal that was more in keeping with the height and scale of the neighbourhood while the latter might have led to greater concerns about bushfire risk and the likely need to evacuate the site. Instead after each decision point the process "goes dark" and it is only when the next decision point is reached that residents find out whether any of their suggestions have been taken on board.

Conclusion:

While I do not oppose the rezoning of the site to SP2 and would welcome a well-planned proposal for medium density housing for seniors, particularly if it included an element of affordable housing, this is not what is included in this proposal.

This proposal would not be out of place in a more built up location such as Gladesville but is totally out of character in Boronia Park. It does not substantially add to the diversity of housing for seniors in Hunters Hill and reduces the number of options for seniors needing residential aged care. There is no up to date community needs assessment to support this.

It will add to existing traffic problems in Boronia Park which is currently used as a "rat run" for drivers wanting to avoid two sets of traffic lights in Boronia Park at the intersections of Ryde Road and Pittwater Rd and Pittwater Rd and Princes St.

Ironically, the height and bulk exceed what is allowable in the newly identified low to medium density housing zone in Boronia Park and the proposal lacks specificity which may be exploited at development approval stage.

For these reasons I object to the Montefiore proposal in its current form and suggest that the Northern Sydney Planning Panel reject it and require the developer to undertake changes that would bring it more into line with the suggestions made in this submission.

Annette Gallard
14 Park Rd
Hunters Hill 2110

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Sydney

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My concerns as per letter.

I have lived in my home on Gaza Avenue for nearly 25 years. I am in my late 60s, still working, and I want to be able to live in my home without added stress. What is being proposed worries me because of how large it is and the impact it will have on my neighbourhood.

My home directly faces the proposed development. I would be potentially facing bulky two-storey buildings, a four-storey building with pedestrian access, and six-storey building behind them. This would greatly reduce my sense of openness and enjoyment of my home. In my opinion, size and height of this development do not suit the character of the street or the surrounding houses.

I fear what may happen once approval is given. The concept plans already show very large buildings, and if the zoning is changed, even more development may be allowed in the future.

At my age, and with hearing difficulties, the environment around my home matters a great deal to me. The scale of the buildings and the ongoing activity would have a lasting effect on how I live day to day.

Gaza Avenue is a very narrow street. With cars parked on one side, there is often only space for one vehicle at a time, and the street is often used by nursing home staff to park while they are at work. At times, some people park too close to my driveway, which makes it much harder to get out safely. When leaving the street, it can also feel unsafe because of oncoming traffic or fast cars. Any increase in traffic or parking would make this worse.

I struggle to visualise how this will benefit our neighbourhood. The new residents will most likely be driving every day, having more visitors than the people needing high care, and there will be more services coming and going. This means more traffic and pressure on Gaza Avenue, and it will be felt most by us who already live here.

The proposal says it will support older people in Hunters Hill, but I think it may do the opposite. Like many people my age, I want to stay in my own home as long as possible. When that is no longer possible, access to local aged care beds is essential. Retirement apartments are a choice, but aged care beds are a real need. If this redevelopment reduces access to that care, I question how it really helps the ageing community.

I worry about what this rezoning could allow in the future. I am afraid that a zoning change could reduce current protections across all of Hunters Hill, and that residents may find it harder to have a say if larger buildings are wanted in the future.

I also ask whether this could be done in a way that better respects the existing restrictions of Hunters Hill and the character of the area. I understand it may be more

attractive for developers to build more apartments, but this must be balanced against the impact on people who already live here.

I am not against change, but change must be fair. Bigger buildings, more activity, and safety worries would bring ongoing stress, and this should not be ignored. I ask the Panel to consider the real experiences of existing residents and to ensure that any decision does not allow development bigger than what the local streets, infrastructure, and community can handle.

Case details

Submission Type

I am making a personal submission

Title

[redacted]

First Name

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Family name

[redacted]

☑ Name withheld

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submission

Submission – Planning Proposal PP-2023-1109

I live in Hunters Hill and make this submission in objection to Planning Proposal PP-2023-1109.

Scale, Height and Zone Inconsistency

• The proposed building heights of up to 24 metres are fundamentally inconsistent with the established low-density residential character of the area.
• Development of this scale and bulk exceeds what is contemplated under the R2 Low Density Residential zoning and would result in unacceptable impacts on streetscape, outlook, residential amenity and neighbourhood character.

Traffic, Parking and Infrastructure Capacity

• Local streets in Hunters Hill are narrow, constrained and already operating under pressure, particularly during peak periods.
• On-street parking, service vehicles and limited road widths regularly create congestion and safety risks, including near misses where vehicles cannot pass safely, particularly in the Boronia Park precinct.
• Staff, visitors and service providers routinely park in surrounding residential streets and Council provided parking adjacent to Boronia Park, despite the availability of free on-site parking, indicating existing parking and traffic management issues.
• The proposal does not provide sufficient evidence that local road networks and infrastructure can accommodate additional traffic, servicing, waste collection and related transport generated by development of this intensity.

Precedent and Cumulative Impact

• Approval would establish a precedent for increased height, density and bulk in low-density residential areas of Hunters Hill, with cumulative impacts that have not been adequately assessed or planned for.

Loss of High-Care Aged Care Capacity

• The proposal would result in the loss of approximately 140 high-care aged-care beds, representing a significant reduction in local high-care capacity.
• Replacing high-care accommodation with independent living units does not align with projected demographic trends, which indicate increasing demand for high-care services as the population ages.
• The proposal fails to demonstrate how it addresses the needs of existing Hunters Hill residents requiring higher levels of care.

Community Benefit and Housing Outcomes

• Despite increased scale and development intensity, the proposal does not demonstrate a clear, measurable or enforceable community benefit.
• There is no certainty regarding infrastructure upgrades, retention of aged-care services, or delivery of tangible improvements for the local community.
• The proposed dwelling mix does not clearly address identified needs for housing diversity or affordability.

Conclusion

Planning Proposal PP-2023-1109 does not demonstrate strategic merit, infrastructure capacity or community benefit sufficient to justify the planning control changes sought. The proposal is inconsistent with zoning objectives, risks adverse cumulative impacts, and would result in long-term erosion of Hunters Hill’s residential character and liveability.

For these reasons, I respectfully request that the planning panel not support this proposal.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Email

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Suburb/ Town

Hunters Hill

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submission

This submission relates to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal.

I object to the proposed rezoning and associated increases in building height and floor space ratio for the Montefiore site.

While I acknowledge Montefiore’s right to redevelop its land and I do not oppose appropriate medium-density seniors housing in principle, I strongly object to the scale, zoning change and impacts of this Planning Proposal on the Boronia Park neighbourhood.

Reasons for objection

1. Excessive scale and height
The proposed building heights of up to 24 metres (six storeys) are wholly inconsistent with the surrounding R2 Low Density Residential area, which is characterised by one- and two-storey dwellings. The proposal represents an overdevelopment of the site and would dominate the neighbourhood in terms of bulk, scale and visual impact.

2.Failure to respect local character
The Hunters Hill LEP 2012 requires development to ensure neighbourhoods reflect local character. This proposal fails to meet that objective. DPHI's own Seniors Housing Design Guide (2023) defines buildings above 3 storeys as high density, which is inappropriate in this context.

3.Inadequate information and lack of a Master Plan
The Planning Proposal does not include a detailed and binding Master Plan showing building envelopes, heights, setbacks, uses and staging. Without this information, residents and decision-makers cannot properly assess impacts such as overshadowing, privacy loss, visual bulk, traffic or amenity.
4. Inappropriate rezoning to SP2 Infrastructure
Montefiore is, and will remain, a residential use. Rezoning residential land to SP2 Infrastructure (Seniors Housing) is unjustified and unnecessary. This rezoning appears designed primarily to bypass existing height and density controls and would set a dangerous precedent within Hunters Hill and beyond.

5. Traffic, access and parking impacts
The proposal is likely to significantly increase traffic in narrow, already congested local streets. The introduction of a major underground car park with access points on High Street and Barons Crescent, including relocated loading dock access, will worsen congestion, increase safety risks for pedestrians and cyclists, and intensify on-street parking pressures.

6.Amenity impacts on nearby residents
Increased noise, light spill, activity levels and overlooking will adversely affect neighbouring properties. Late-night and early-morning staff movements, service vehicles and shift changes are of particular concern in a quiet residential area.

7.Poor site suitability under current housing policy
The site is not well located relative to shops, services or public transport, contrary to contemporary State Government housing principles. The nearest local shops are approximately 1.2km away, making the location less suitable for high-intensity seniors housing.

8.Construction impacts
A lengthy construction period, likely exceeding two years, will result in major disruption including heavy vehicle movements, excavation of large volumes of soil and rock, noise, dust, parking loss and traffic delays throughout the surrounding neighbourhood.

9.Inadequate community consultation

Community consultation to date has been insufficient. No Council- or State-led public consultation meetings have been held, despite the scale and significance of the proposal and advice from the Local Planning Panel.

Conclusion

The Planning Proposal represents an excessive and inappropriate intensification of development that fails to respect the established low-density residential character of Boronia Park. It relies on an unjustified rezoning, lacks sufficient detail, and would cause long-term adverse impacts on traffic, amenity, privacy and quality of life for local residents.

I respectfully request that the Planning Proposal be refused or substantially amended to:

- retain residential zoning,
- significantly reduce building heights and density, and
- require a detailed, publicly exhibited Master Plan prior to any further consideration.

Yours sincerely,
[redacted]

Local resident of Gaza Avenue,
Hunters Hill

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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[redacted]

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See attached file

Submission to Sydney North Planning Panel – Montefiore Senior Living Proposal

I am making this submission not only as a long term resident of Boronia Park living within 500 metres from the existing facility but as a daughter whose mother is cared for in its high care dementia unit.

However, I do not support this proposal which seeks to rezone the site from R2 low density residential to SP2 Infrastructure (Seniors Housing) as it fails to adequately address a number of issues.

Bushfire risk

The area subject to the proposal is bounded on 3 sides by bush land and it poses a high bushfire risk.

In addressing this risk the proposal seeks to exclude Lot 9 & 10 of DP 724017 in order to satisfy Condition1 (a) of the gateway determination. These lots are located in the south east corner of the site and represent not only the highest bushfire risk on the site but also house the least physically mobile residents of the existing aged care facility (ACF).

This risk is exacerbated by restricted road access for emergency vehicles and limited evacuation routes posed by the High St & Barons Crescent cul de sacs

This is unacceptable- bushfire mitigation should be applied across the entire site per established guidelines from the RFS

I note a proposal for an aged care facility in Middle head with similar bushfire & evacuation issues was rejected in 2013 see **https://www.hpg.org.au/middle-head-aged-care**

Community housing needs

The reality of an ageing population and the rising “tsunami” of dementia means that there will be an increased demand for aged care beds in the near future. The Government is also seeking to increase the stock of affordable housing.

I query whether the proposal can meet these needs given it proposes the:

- reduction in residential aged care beds from 334 to 194 at a time when the reverse should apply

- addition of 144 independent living units (ILU’s) for seniors marketed as “luxury accommodation” which will be anything but affordable or diverse given the existing

Montefiore Randwick redevelopment see:
https://go.montefiore.org.au/webmail/935853/1089328453/155b5a04a937aab9238da7e8c2a0d1788ddaf0128816577ec14375f984b7ccc8

In addition there is a danger that if successful this proposal will set a precedent for the other ACF's in the LGA to follow suit towards providing more luxury ILU's at the expense of aged care beds

Scale of proposed development

Apart from the increased bush fire risk posed by the additional development (see above) the scale is totally inappropriate for the existing precinct which is primarily made up of one & two story dwellings.

The proposed 4 & 6 story building height & floor space ratio focusing so heavily on providing high density luxury ILU's far exceeds and is incompatible with the current R2 low density character of the precinct. The existing Montefiore Randwick site gives a good indication of just how intrusive to the existing low density streets-cape this proposal would be: **https://www.domain.com.au/project/4496/m-by-montefiore-randwick-nsw/**

Thus fundamentally changing the nature of the area significantly for the worse for all residents in terms of traffic congestion and overshadowing (see below).

Traffic

The current proposal relies on traffic volumes based on counts conducted during Covid (2021) which, even then, exceeded the maximum standard volume for local roads[1]

It should not proceed further until a current independent traffic assessment is conducted to realistically gauge the impact on the precinct of congestion, parking and pedestrian safety issues arising from:

- additional truck movements during the construction phase
- a planned 260 odd car park,
-higher volumes of delivery vehicles using the new loading dock in Barons Cres
- cafe and proposed medical ancillary uses

1 Boronia Park Precinct Draft Local Area Traffic Management Plan (15 June 2021)

Heritage

As a keen gardener one of the reasons my mother choose the Monte ACF was its established gardens which the Urbis report regarded as having "local heritage significance at a historical, aesthetic, social & representative level" [2].

Yet the proposal has chosen to locate its proposed 2x6 story seniors accommodation to the north of the main garden. This will severely overshadow the garden & impact residents enjoyment of the area.

As such I cannot support the proposed building heights. However I would welcome an independently prepared conservation management plan as per the LPP that considers this and other items of heritage significance on the site.

Conclusion

My concerns with this proposal are consistent with the views expressed by other local residents, Hunters Hill Trust & Council and I object to the current proposal to rezone the existing site to SP2 Infrastructure (Seniors Housing) for the reasons stated above.

Whilst not against additional housing on the site per se, I believe any future development should remain within the current R2 low density zoning provided it can address the risk of increased housing (of any type) in such a bushfire prone location.

2 Urbis, Heritage Assessment & Opportunities & Constraints: Montefiore Hunters Hill (November 2021) 52 {6.3.3}

Submission Type

I am making a personal submission

Title

Mr

First Name

Jeff & Louise

Family name

Howlett

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

Please find attached our submission in relation to the Montefiore Seniors Living Proposal PP-2023-1109.

Regards

Jeff & Louise Howlett

Tuesday 27th January 2026

Attention: Sydney North Planning Panel
Montefiore Seniors Living Proposal
PP-2023-1109

Sydney North Planning Panel,

We are local residents directly and materially affected by the proposed redevelopment of the Montefiore site.

We do not object to aged care or seniors housing in principle or the need to modernise existing facilities at Montefiore or the replacement of aging properties fronting Gaza Avenue.

Our objections relate to the proposed rezoning and scale uplift, which introduces six-storey and four-storey built form that is disproportionate to the suburb, inconsistent with the R2 Low Density Residential context and not adjacent to local town centres as per revised Hunters Hill Council density guidelines, and unsupported by demonstrated local need or aged care infrastructure capacity.

Built Form, Bulk and Overshadowing

The proposal introduces six-storey and four-storey buildings alongside extensive two-storey development in an established low-density residential area. Planning assessment requires consideration of cumulative bulk, massing, and perceived scale, not height in isolation.

- The six-storey ILU building represents a significant departure from what is contemplated under the Hunters Hill LEP and Seniors Housing SEPP. Its height and mass will result in overshadowing, loss of outlook, and visual dominance for adjoining properties. These impacts have not been demonstrated as acceptable or mitigable.
- The four-storey elements, described as “transitional,” remain out of scale and materially reduce solar access and residential amenity.
- The extensive two-storey components, with long façades and high site coverage, contribute to cumulative bulk. Together, the two-, four-, and six-storey elements present as an institutional campus rather than a residentially integrated development.

Streetscape, Visual Amenity and Character

Continuous built edges, service access, and ancillary infrastructure undermine the landscaped, low-scale streetscape that defines Hunters Hill. The proposed development is inconsistent with the intent of the R2 zone and will result in a permanent shift in local

character outside of Local Town Centres such as Boronia Park Village & Gladesville Village which have been identified as areas of possible height increases.

Proposed site set back from Gaza Avenue is 8.5m which is less than Barons Crescent and less than the ~10m set back (image 1) currently in place for the residential side of Gaza Avenue (1-19 Gaza).

Image 1: ~10m set back in place on Gaza Avenue

Despite current site security requirements and Hunters Hill Heritage boundary fencing requirements, we are unable to assess the proposed boundary fencing plans for the site as they have not been provided. We would strongly urge that they are in keeping with the Hunters Hill heritage requirements (brick, picket etc) not the current Barons Crecent style fencing (image 2).

Image 2: current boundary fences need to be upgraded for security and to bring them into line with Hunters Hill heritage requirement (brick fence etc)

Traffic, Parking and Pedestrian Safety

Existing streets are narrow and constrained, with on-street parking regularly reducing carriageway width and compromising safety. Traffic modelling does not reflect these conditions. Increased service, delivery, and visitor movements will exacerbate congestion and pedestrian risk, particularly along Gaza Avenue and surrounding streets.

Rezoning without secured, proponent-funded infrastructure upgrades transfer risk to the local community and Council, contrary to orderly planning principles.

Gaza Avenue is now only 4m wide (image 3), excluding the roll top parking, so adding pedestrian access via Gaza will only add to traffic congestion in an already constrained throughfare. The Transport Impact Assessment for Montefiore does not specify a reason why pedestrian access is required via Gaza Avenue. We strongly oppose any access points on Gaza Avenue for the new development.

Despite the increased underground parking expansion, according to the Transport Impact Assessment for Montefiore only 44 of the 218 car spaces will be allocated for staff which despite estimated staffing levels peaks of 73 people each day. Current street congestion will worsen with the proposed development.

Image 3: Gaza Avenue is only 4m wide so it is an inappropriate throughfare for pedestrian access to the new development

Local Need and Evidence Gap

The proposal does not demonstrate that demand originates from the local catchment rather than metropolitan or external sources. The removal of approximately 140 high-care beds—around 30% of Hunters Hill's existing capacity—contradicts ageing-in-place trends. AIHW data indicates home care utilisation has increased by over 280% between 2017 and 2024. These figures highlight a misalignment between the proposed use mix and demonstrated local need.

Planning Merit and Proportionality

Existing planning controls already permit seniors housing and aged care redevelopment. The applicant has not demonstrated why six-storey, four-storey, and extensive two-storey buildings are required to achieve reasonable outcomes. Commercial considerations do not justify disproportionate amenity impacts.

The proposal fails the tests of proportionality, contextual integration, and orderly development.

We urge the Sydney North Planning Panel to refuse PP-2023-1109. The proposed rezoning and scale uplift are incompatible with the R2 Low Density Residential context, impose unacceptable amenity impacts, and lack clear justification in terms of local need or infrastructure capacity.

Regards

Jeff & Louise Howlett

15 Gaza Avenue

Hunters Hill NSW 2110

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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1. Transport Infrastructure inadequate to facilitate additional demand

The applicant has not adequately addressed fundamental issues relating to the inadequate road infrastructure leading to the applicant's premises. The roads were originally designed for low density traffic volume, with current overflow often resulting in both entry points (i.e. High Street & Barons Cresent) narrowing into a single lane for traffic going in both directions. This congestion poses a safety risk for both pedestrians and motorists. See accompanying photos of Barons Cresent & High Street.

In addition, public transport to the applicant's premises is limited, with many staff/visitors opting for personal use vehicles. This not

only increases traffic but also traffic noise and local street parking issues.

2. Loss of Local Character

Hunters Hill has a rich history with many of houses on Gaza Avenue serving as ex-war veteran houses. The rezoning of the area will result in a loss of local character and greenery, replaced by large scale commercial building misaligned with Hunters Hill character and heritage.

3. Community benefit vs Corporate Profit Incentives

The applicant has promoted the proposed rezoning as a community benefit, however proposes to reduce high care beds by 30%. It is questionable whether such a decision is underpinned by social benefit or rather corporate profit margins.

4. Excessive scale

Proposed building heights and size are excessive, and would overwhelm neighbouring properties, dimmish light and fundamentally alter established local street appearance.

5. Precedence

A decision to rezone will set unfavourable precedence for further rezoning decisions, further magnifying the fundamental issues highlighted above.

EHK·96R

Submission Type

I am making a personal submission

Title

Mr

First Name

Bob

Family name

Hayes

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Sydney

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submission

Please see the uploaded file. Thank you. Bob Hayes

BOB HAYES – LOCAL RESIDENT

SUBMISSION RE: Montefiore Seniors Living Proposal - PP-2023-1109
SUBMISSION DATE: 28 January 2026

Submission Statement

- **This submission relates to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal.**
- **I object to the proposal.**
- **The reasons why I object to the proposal are set out below.**

I am a long-term local resident. I am making this submission as a member of the Montefiore Redevelopment Community Action Association Inc. (MRCAA), but not currently an office-bearer.

Introduction and Structure of this Submission

The Montefiore Seniors Living Proposal PP-2023-1109 **(The Proposal)** was placed on Public Exhibition by the Department of Planning, Housing and Infrastructure (the Department) on 20 November 2025. A revised closing date for public submissions is 5pm 28 January 2026.

The Montefiore Seniors Living Proposal aims to rezone part of Montefiore's existing site to allow a major and complex redevelopment project to provide additional seniors housing which will increase permitted building heights, density and Floor Space Ratios.

The current Proposal will result in multiple unwanted and significant impacts in a quiet and environmentally sensitive part of Hunters Hill.

The Proposal is seriously flawed in several respects and should return to the Department for rectification and subsequent re-exhibition.

I am deeply concerned about, and object to, the Montefiore Seniors Living Proposal in its current form for reasons set out in this submission.

This submission is in 6 parts:

1. Objections regarding the current overall proposal
2. Failure to provide adequate detail, clarity, consistency and certainty
3. Objections regarding things not done or not adequately done.
4. Site-Specific Impacts not adequately identified and addressed
5. Recommendations
6. Appendix 1- Brief Summary of the Montefiore Seniors Living Proposal
   Appendix 2- Statement of my position re the Montefiore Seniors Living Proposal.

Part 1 Objections regarding the current overall Proposal

1A. The scale of the Proposal is excessive and out of local character.

The Proposal should be significantly reduced in size and made consistent with the NSW Government's *Seniors Housing Design Guide (November 2023)* Medium Density provisions for ILUs (Section 15.1).

- The **scale, bulk and height** of proposed building development is **much too large and amounts to gross overdevelopment**.
- The proposed four storey **buildings fronting along Montefiore's Barons Crescent boundary (Building A (16M) and B (18M)) are of unacceptable and excessive bulk and height** (even with the proposed 3 metre setback of the fourth level).
- Under the currently proposed 4 storey building height, both Building A and B will be a visual blight on the surrounding neighbourhood – dramatically different in appearance to the surrounding residences of two storeys or less and **blatantly at odds with character, integrity and amenity of the R2 neighbourhood which surrounds the site**.
- **The Montefiore site** was, currently remains and will continue to be residential and used for Seniors Housing and Aged Care. Its **zoning should remain Residential.**
- **The scale of the Montefiore Living Proposal should be reduced to be consistent with the Medium Density Independent Living Unit (ILU) principles of the NSW Government's *Seniors Housing Design Guide (November 2023)*. In particular, Objective 15.1.1 states** "To provide two or three storey housing clusters where the scale and massing is articulated and separated to respect the character and pattern of the suburban surroundings." (P101**)**
- Section 4.2 of the Seniors Housing Design Guide (p31) provides guidance on the **objectives** and need for new seniors housing to **reference local character and acknowledge its surroundings, namely:** ***"****The modulation of the bulk and form of new buildings of larger scale than the surrounding context should reference the local character and urban arrangement to acknowledge its surroundings…*
  Objective: 4.2.1 To compliment the existing surrounding built character. 4.2.2 To sensitively integrate a new development into its surrounding area and to ensure the building scale and form supports the local context and future character of the area."
- **Clearly, consistency with the existing built character, scale and form of the surrounding neighbourhood is an objective of the Design Guide and does matter.**
- **I believe that Medium Density should apply across the entire site to appropriately integrate the new development into the surrounding area, with one exception.**
- Montefiore has stated in its Urban Design Report (Appendix B) that **2 storeys is the current proposed height limit in Gaza Ave** "… to maintain existing street character" (p9).
  The same reasoning should logically apply the 2-storey height limit along Barons Crescent as well.
- **To be absolutely clear – the building height limit along Barons Crescent should be 2-storeys to match the 2-storey height limit along Gaza Ave already volunteered and justified by Montefiore.**
- **Elsewhere in the Montefiore site subject to the Proposal, the permissible height should be no greater than 3 storeys which is the height limit for medium density Independent Living Units (ILUs)** specified in the NSW Government's *Seniors Housing Design Guide (November 2023)*.
- **The entire site should retain a Residential zoning.**

1B. Failure to comply with relevant State and Local Government legislation and policy.

- The Proposal fails to comply with the need to recognise and enhance the character, amenity and identity of local neighbourhoods.
- The Proposal **is inconsistent with *State Environmental Planning Policy (Housing) 2021 Schedule 8*** *Design principles for seniors housing S.97* "… to maintain reasonable neighbourhood amenity and appropriate residential character …by (iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings".
- It is also **inconsistent with the Hunters Hill LEP 2012** which aims S1.2(a) "…To maintain and enhance the character and identity established neighbourhood s in Hunters Hill by regulating the use of land…".
- Further, it **fails to meet the objectives of NSW Government's *Seniors Housing Design Guide (November 2023)*, in particular Objectives 4.2.1, 4.2.2 and 15.1.1** (quoted in Part 1 above).

Part 2. Failure to provide adequate detail, clarity, consistency and certainty

2A. Indicative Masterplan - lack of detail, clarity, consistency and certainty

- A **Draft Indicative Masterplan** (Figures 18 and 19) is included in the Planning Proposal on p57 and in the Urban Design Report (Appendix B). However, **it is lacking sufficient detail and certainty and is subject to strong caveats** (repeated in the DCP and Urban Design Plan). The Planning Proposal states "*This Report includes a draft Indicative Masterplan which represents one potential design outcome for the site, noting that the ultimate (and detailed) design outcome would be the subject of future DA/s"*. (Page 6)
- The Urban Design Report shows Building B as a 4 storey building 10m from the boundary. However, Figure 2.6 page 22 states "T*he proposed use and mix of Building B will be determined at DA stage and could include various ancillary facilities associated with seniors housing."* Building B is colour-coded "Potential Communal Use".
  Figure 2.4 Proposed Scheme Sections shows Building B colour coded as Seniors Housing but Communal on the Ground Floor. It states the caveat *"Note: The proposed use and mix of Building B will be determined at DA stage and could include various communal and ancillary facilities associated with seniors housing."*
- The Site-Specific Development Control Plan (DCP) Figure 2 Masterplan (page 7) shows indicative building locations and heights but no intended use. However, Figure 5 of the Landscape Plan (page 10) shows Building B as Communal.
- Therefore, the **locations of buildings, their heights and permitted uses are unclear, inconsistent and uncertain – they may or will change at the DA stage** of the process.
- **This fails to provide the reliable basic information required as the justification for rezoning.**
- There is so little detailed and consistent information provided in the Planning Proposal and related documents that **rezoning**, if approved, would be **based purely on speculation** about what will be proposed in any future DA(s).
- **How can this be proper process?**

2B. Significant change in Project Scope (Site definition) and LEP Completion Date

- **Another area of inconsistency concerns** the change to the **Legal Site Definition** (Address / Allotment) **and LEP Completion date**.
- These **changes were made by the Department** on 7 November 2025 (shortly before Public Exhibition commenced) by an *Alteration to Gateway Determination* **from "…rezone the site…"to "…rezone part of the site…**".
- This change had the effect of excluding the residential aged care facilities in the southern part of the site from the rezoning.
- The Planning Proposal is **now limited to only part of the originally proposed site** (previously, the entire site was to be rezoned).
- **The Alteration also lengthened the LEP completion date which had expired on 5 May 2025.**
- It appears that the Aged Care Facility has been excised due to bushfire compliance reasons. However, **I am not aware of any public explanation by the Department or the Proponent** regarding these changes and it has not been adequately publicised.
- **This lack of clarity, consistency and certainty is an anomaly in due process.**

2C. Change in proposed Permitted Use of Building B in Barons Crescent.

- **The proposed permitted use of Building B** in Barons Crescent has **changed from Seniors Housing "ILUs" to "Communal"** in the Urban Design Plan and Site-Specific DCP (Landscaping Plans only) **without adequate explanation or discussion about potential implications.**
- **Page 12 of Appendix B Urban Design Report states** "***The proposed use and mix of Building B will be determined at DA stage*** *and could include various communal and ancillary facilities associated with seniors housing*". Mention has been made of a possible restaurant, café, administration area, staff accommodation units, allied health and ancillary medical facilities.
- **If this is the case, then Building B would become a Mixed-Use facility. It should therefore not be zoned Seniors Housing as it will not be used for that purpose, particularly if any facilities are open to the public.**
- Building B is a large building and occupation of the space may require a wide range of tenants, commercial service providers and/or owners.
- Any change in permitted use could have very **significant implications for the impacts of the Proposal on the surrounding residents**, particularly with regard to levels of traffic, parking and noise. For example, Specialist Suites or Allied Heath services such as physiotherapy practices could attract a wide range of public patients who might choose to park in Barons Crescent rather than in the underground carpark. There is currently an indicative pedestrian entrance to Building B from Barons Crescent.
- **This type of permitted use is highly inappropriate and should not exist in a residential area. Its Lot (that part of Lot 2 DP312298) should remain as R2 Residential (it's existing zoning) and be excluded from the scope of the Planning Proposal.**
- **There has been no public explanation about the change in permitted use of Building B** other than some reference in the bushfire reports indicating issues with compliance.
- **Again, this lack of detail, clarity, consistency and certainty is unacceptable and would jeopardise any rezoning process. Its use is speculative.**

2D. Minimum Age Conditions

- The Planning Proposal **documents do not appear to state what age conditions will be imposed on those purchasing and/or occupying** the ILUs. Normally, Seniors Housing would be expected to only be available to those formally defined as Seniors.
- **The lack of stated minimum age conditions could have significant implications for the impacts** on surrounding local residents as younger people are more likely to be actively working and more car movements, parking and noise issues may result. **The Proponents should clarify any intended minimum age or other intended conditions** to guarantee that this is indeed housing for seniors.

Part 3. Objections regarding things not done or not adequately done

3A. Required Demonstration of Site-Specific Merit

- The NSW Government's ***LEP Making Guidelines August 2023*** states: "For a planning proposal to proceed through Gateway determination, **the Minister (or delegate) must be satisfied that the proposal has strategic and site-specific merit** and that identified potential impacts can be readily addressed during the subsequent LEP making stages." (P72).
  The Planning Proposal must "… identify the potential environmental, social, and economic impacts of the proposal and outline proposed mitigation measures and justification." (P73)
- **This Planning Proposal has demonstrably failed to adequately demonstrate site-specific merit**.
- **Therefore, the Proposal failed, and still fails, to meet the required criterion for Gateway approval**, **namely that it demonstrates both strategic and site-specific merit**.
- **It should never have proceeded to Gateway.**
- **Failure to adequately address site-specific merit in the Planning Proposal was first detailed by Hunters Hill Council** Reporting Officer Mr Steve Kourepis in his report to Hunters Hill Council for the Extraordinary Meeting of 12 September 2023.. The Council went on to reject the Montefiore Planning Proposal at that meeting. **Further detail is provided later in this submission under the sub-heading Site-Specific Impacts Not Adequately Identified and Addressed.**
- Little appears to have occurred in addressing the LEP Guidelines' requirements regarding site-specific merit in the two years since the Council's rejection.
- **Site-specific merit remains inadequately demonstrated** in the current proposal primarily because the potential impacts of the project are still not adequately identified nor mitigation measures proposed, as required by the Department's LEP-Making Guidelines.
- **My list of 25 potential site-specific impacts which have been inadequately addressed, or not addressed at all, is shown in Part 4** of this submission below.

3B. Site-specific DCP

- **A Site-Specific Development Control Plan (DCP) (Appendix M) has been prepared by Urbis** on behalf of Montefiore (the Proponent).
- **Firstly, I object to the lack of detail it contains. It lacks clarity, consistency and certainty.**
- **Secondly**, It is not apparent to me that it complies with the directives in the *Hunters Hill Consolidated Development Control Plan 2013*, including, but not limited to the provisions of Part Two – Character and Heritage of the Hunters Hill Municipality Chapters 2.2 - 2.4
- Application of this Consolidated DCP is set out in Part 1.2 which states:
  (*a) This plan applies to all lands within the Municipality of Hunters Hill, and to all types of development which are permitted by the Hunters Hill Local Environmental Plan 2012 (LEP 2012).*
  (b) Section 79C of the Environmental Planning and Assessment Act requires the consideration of this Plan together with any applicable planning instruments and policies" (which include the Local Planning Instrument and Policies and State Environmental Planning Policies).
- **Thirdly**, my understanding is that **Site-Specific DCPs are normally prepared by the respective Municipal Council with input from the proponent, rather than wholly by the Proponent themselves.**

  It appears that, in this case, **the proponent (Urbis / Montefiore) have specified their own site-specific controls for their own subsequent compliance.** I have not been able to ascertain whether the document was created jointly with Hunters Hill Council. If not, then this is unacceptable.
- **I recommend that, as a matter of due process, the DCP needs to be further developed, finalised, approved, then "owned", controlled and applied by Hunters Hill Council.**

3C. Inadequate Traffic Impact Assessment (TIA)

I have concerns that this important Gateway requirement has not been adequately completed, despite almost two years since Gateway Determination.

- **The Traffic Impact Assessment (TIA - Appendix F) is inadequate**.
- The TIA's conclusion that "*the proposed development is expected to have a minimal traffic impact on the surrounding road network*" (p33) **appears to significantly understate the traffic implications** of the Seniors Living Proposal as:
  - **The Proposal will result in significant increases in vehicle numbers and related traffic movements**, both in the streets surrounding Montefiore and the local approach roads inside the Boronia Park Precinct boundary (the area between Ryde Road and Pittwater Road). Residents, staff, visitors, deliveries and the replacement of current non-driving aged care residents with relatively healthy and active people who drive is likely to make a significant contribution to local traffic levels.
  - **The TIA is based on an out-of-date and compromised local area traffic study** (ie. *the June 2021 Boronia Park Precinct Draft Local Area Traffic Management Plan*).

- Since then, traffic numbers have grown as a result of COVID recovery, higher population density in the local area and in Sydney generally, working from home and more rat-running from outside the area. A Hunters Hill Council study shows that peak traffic levels in at least one street in Boronia Park already exceeds environmental maximum capacity standards (300 movements per hour).
- **I recommend that a new TIA should be carried out by an independent expert and based on current peak traffic levels in the Boronia Park Precinct.**
- The **permitted use of Building B,** now labelled as "Communal", is **unclear**. The ultimate permitted uses and functions could have a significant impact on nearby traffic and parking on Barons Crescent.
- In the 2021 TIA, Barons Crescent is described as "One lane in each direction". In reality however, for most of its length, when cars are parked on both sides of the road, Barons Crescent can now be described as virtually "One lane".
- The **congested nature of Barons Crescent** and the significant difficulty of two-way traffic flow under typical parking conditions has apparently **not been adequately taken into account** when discussing the impact of likely future traffic increase accessing the Barons Crescent carpark entry point.
- **The proposal to direct around half of all carpark traffic movements through the Barons Crescent carpark** / Loading Dock entry point is, **in my view, dangerous and impractical.**

- In order to get to the proposed Barons Crescent vehicle entry, when compared with the High street Vehicle Entrance, **drivers will need to drive further** along Park Road, High Street, Gaza Ave, Blaxland Street or Barons Crescent, none of which can cope with increased traffic.
- Even a relatively small amount of delivery trucks will **significantly impact on the safety** of cars, buses, trucks and pedestrians in the southern part of Barons Crescent.
- **I therefore recommend that the High Street carpark entry be designated as the only entry and exit point for vehicles other than Loading Dock vehicles**. **Barons Crescent entry / exit should not be used.**

3D. Strategic Bushfire Strategy regarding Building B

- The RFS bushfire approvals required for the Proposal do not appear to be complete.
- Appendix N, the Strategic Bushfire Strategy (p11) states "*Site Master-planning shows that **Building B**, which is affected by the Category 2 Bushfire Prone Land to the North East of the site has been **reconfigured from independent living units to mix of ancillary uses,** including administration, communal facilities and staff housing, to meet the Asset Protection Zone (APZ) setback requirements of the Planning for Bushfire Protection 2019 (PBP)*".
- T**he proposed permitted use of Building B has been changed from Seniors housing ILUs to Communal. However, going forward, it remains unclear.** I have noticed that there is no mention of Building B in Superintendent Laurence McCoy 's RFS correspondence in the Attachment RFS Advice Combined dated 8 September 2025 (Spt. McCoy does, however, refer to Buildings A, C and D).
  Why is there no official RFS reference to Building B? This is not sufficient.
- **Whether or not there is any realistic possibility that seniors housing ILUs could become an approved permitted usage of Building B needs to be reliably determined and clearly stated**

before rezoning. Any other proposed permitted use needs to be clearly specified in advance of rezoning consideration.

- **I strongly recommend that an official RFS statement be obtained regarding the bushfire compliance requirements if Building B is to contain ILUs**. It is apparent that more work needs to be done prior to rezoning consideration.
- It is disturbing that the Services Infrastructure Report (Appendix C) suggests that **existing water supply may not be adequate and "would require amplification" for fire-fighting purposes** (Hydraulic Services page 13). Discussions with Sydney Water are intended to be carried out as part of DA requirements. That is too late.
- **If Seniors Housing is not feasible in Building B then that part of Lot 2 DP312298 should be excluded from the rezoning to SP2 Infrastructure (Seniors Housing) Proposal and remain R2 zoning**.

3E. Has Montefiore adequately considered the distance to nearest amenities, lack of public transport and aircraft noise?

- **The Montefiore Planning Proposal does not meet the criteria for application of the NSW Government's Low and Mid-Rise Housing Policy.**
- The Montefiore site is **outside the 800-metre walking distance radius** from Boronia Park "Town Centre" and local public facilities are not easily walkable for many seniors.
- The **adjacent public transport** is limited to one 538 bus service each hour to Woolwich Ferry Wharf and one to Victoria Road Gladesville.
- **It is recommended that the Community Needs Assessment dated 8 August 2023 be reviewed and updated** (especially page 6 Ground Floor Plan and the associated statistics regarding car spaces, ILUs, building uses etc.) as well as a more accurate assessment of the location and ease of access to local facilities. At the moment it is incorrect.
- **Aircraft noise - The site is directly under the Runway 16R North to South flight path for aircraft arrivals into Sydney Airport.** The existing (2039) Australian Noise Exposure Forecast (ANEF) chart shows the 20 ANEF contour as reaching near the Montefiore site southern boundary. When the 2045 ANEF is finalised (note that the current draft ANEF published in the latest Preliminary Draft Master Plan for Sydney KSA Airport is known to be incorrect) **the 20 ANEF contour is highly likely to extend further over the Montefiore site** as the number of future passengers is expected by Sydney Airport Corporation Ltd to grow by 75% by 2045. This means many more planes, bigger planes and more noise.
- 20 ANEF is the aircraft noise contour representing significant (Moderate Impact) aircraft noise for the affected residential community. During peak hour arrivals from the North (now up to 9 hours a day) there is an aircraft over Montefiore Home or nearby Lane Cove (on the 3rd Runway 16L flight path - still audible), on average, every 90 seconds.
- **NSW Government policy (based on AS 2021:2015 *Acoustics – Aircraft Noise Intrusion*) is that it is only Conditionally Acceptable to build in 20-25 ANEF contour zones:** Building is permitted but requires mandatory acoustic treatments (e.g., insulated walls, acoustic windows) to meet internal noise level targets.

3F. Site security and pedestrian entry points

- It is noted in the Planning Proposal (Figures 18 and 19) and Urban Design (Architectural) Report (Section 2.6 Proposed Scheme Plans) that several pedestrian entry paths lead to Buildings A and other ILUs from Gaza Ave and there are two pedestrian entries onto the site from Barons Crescent.
- This is surprising from a site security point of view and is a concern for related traffic and on-street parking levels. Residents may decide not to drive further to the underground carpark.
- Montefiore has traditionally been a relatively secure site.

3G. Urbis Heritage Report

- The Heritage report (Appendix I) seems to be relatively unconcerned about the heritage value the Synagogue and the historic WW2 Bunker. I believe the risks should be identified, assessed and treated in order to protect these special facilities. The potential impact is permanent damage or loss of these significant entities. The local Planning Panel recommended an independent heritage assessment and a conservation plan.
- The Minutes of the Local Planning Panel Meeting 22 June 2023 stated:

  "iv. A conservation plan to assess the whole site including the garden and synagogue be prepared by an independent heritage expert".
  That assessment does not appear to have been done.

3G. Failure to adequately consult with the community.

- In June 2023, the **Local Planning Panel** decided **not** to support the Montefiore Planning Proposal progressing through to the Gateway Process and made several **recommendations** including one **that public consultation be carried out**.
- However, **no public consultation was carried out** by Hunters Hill Council, the Department or the Proponent (other than a small on-site exhibit of Montefiore proposals at the start of the project, attended by a limited number of nearby local residents who received a letterbox invitation).
- The **only direct consultation with the public occurred at two** well attended public Information **meetings arranged by the MRCAA** to which Council members and the proponents were invited but, except for two Councillors, did not attend.
- Relatively few people in Hunters Hill are likely to know about the Planning Proposal were it not for letterbox pamphlets from the MRCAA and their two public meetings.
- The timing of the Public Exhibition of this Planning Proposal over the Christmas / New Year holiday period may have impacted on the level of public awareness of this Proposal and its implications.
- **It is recommended that the Department arrange a public information meeting as soon as practicable after the review of public submissions arising from this Public Exhibition.**

Part 4. Site-specific impacts not adequately identified and addressed

As outlined in Part 3A, t**he Planning Proposal has demonstrably failed to adequately demonstrate site-specific merit**.

The currently-proposed increase from low density residential zoning (R2) to medium and high-density **will cause multiple significant site-specific impacts on the local community**, which have not been adequately identified, assessed and addressed (ie. eliminated or properly ameliorated) by the Proponent in the Planning Proposal.

A number of these inadequacies were identified by the Council Reporting Officer Mr Steve Kourepis and listed in his Report to Hunters Hill Council. Please click on the following link to view that Report Extraordinary Meeting of 12 September 2023.

Importantly, on Page 15 of his report Mr Kourepis stated "*Few aspects of social impact have been considered by the Planning Proposal.* ***Consequently, the Planning Proposal is unable to demonstrate that the proposal has merit, nor that potential social impacts can be readily addressed during the subsequent LEP making stages*****.**" As mentioned above**, a Proposal fails to meet the required criterion for Gateway Determination unless it demonstrates <u>both</u> strategic <u>and</u> site-specific merit.**

Hunters Hill Council resolved at that Extraordinary Meeting on 12 September 2023 <u>not</u> to support the Montefiore Planning Proposal for 12 reasons which are listed (1 – 12) on the Hunters Hill Council Montefiore Project webpage "Update 27 October 2023" (Please click on https://connect.huntershill.nsw.gov.au/montefiore) **Most of the 12 issues listed as reasons for rejection by Hunters Hill Council have remained unresolved since 12 September 2023.**

The Proponent then by-passed Hunters Hill Council - on 27 October 2023 the Proponent submitted a rezoning review to the Department.

In June 2024, the Planning Proposal, which was coordinated by the Sydney North Planning Panel (unfortunately, the panel did not include local representation) and assessed by the Department (DPHI), was issued with a Gateway Determination, subject to some conditions.

In my view, this Gateway Determination should never have been issued because the mandatory Site-Specific Merit requirement had not then, and still has not, been met. Consequently, I question whether due process has been followed with this Gateway Determination.

Nevertheless, I now have an opportunity to suggest 25 potential impacts (including some groups) which the proponent should properly address (that is, assess and ameliorate).

The following is a list of 25 of the main impacts and concerns which I believe have not been adequately identified, described, assessed and ameliorated by the Proponent in the Planning Proposal or its related supporting documents. **I recommend that the Proponent addresses the following potential Site Specific Impacts:**

1. **The inadequacies listed under the heading Site-Specific Merit identified by the Council Reporting Officer Mr Steve Kourepis** in his Report to Hunters Hill Council for Extraordinary Meeting 12 September 2023 (pages 15-16) . Please click on: https://connect.huntershill.nsw.gov.au/montefiore

These largely relate to issues with the Community Needs Assessment (Appendix G) inadequacies. Mr Kourepis states: "Few aspects of social impact have been considered … **Consequently, the Planning Proposal is unable to demonstrate that the Proposal has merit…".**
These inadequacies should be satisfactorily addressed before proceeding with the Gateway Process.

2. **The 12 reasons listed in the Hunters Hill Council's resolution to reject the Planning Proposal** at Extraordinary Meeting 12 September 2023 (please click on https://connect.huntershill.nsw.gov.au/montefiore). These still have not been resolved or adequately addressed.
The Council Resolution's opening statement was "The Planning Proposal lacks strategic merit and fails to meet site-specific merit and meet relevant Government guidelines and community expectations". Specific inadequacies were then listed.
These inadequacies should be addressed before proceeding with the Gateway Process.

Other potential impacts for consideration and action

3. ***Impact: Visual intrusion and loss of privacy:*** Indicative building heights are clearly **too high** and of **excessive scale** and bulk, **particularly around the Barons Crescent perimeter**. The 6 storey buildings will also be an eyesore from Gaza Ave. The proposal **needs to be much more moderate** in scale.

4. ***Impact: Loss of character and amenity:*** It **is absolutely unacceptable for Barons Crescent Building A and Building B to be 4 storeys. These massive buildings will have a devastating impact on the local streetscape and local neighbourhood. They will dwarf and dominate the surrounding R2 dwellings and look totally out of local character.**

   Amelioration:

   a) Buildings fronting Gaza Avenue and Barons Crescent (including Buildings A and B) should be limited to 2 storeys, consistent with Montefiore's self-imposed restriction to 2 storeys in Gaza Avenue and with the same voluntary justification that the buildings should *"… maintain existing street character"*.

   b) All other buildings on the site should be limited to a maximum of 3 storeys.

   c) The entire site should have a residential zoning and be consistent with the NSW Government's *Seniors Housing Design Guide* (November 2023) Medium Density ILU provisions.

5. ***Impact: Loss of character and amenity:*** The currently proposed **Medium to High Rise** development **would otherwise destroy the quiet amenity, appearance and feel of the local area** and be contrary to the reasons many people moved to this area in the first place over many decades.

7. ***Impact: Loss of character and amenity****:* Some existing local residents report that they feel that the character and amenity of their safe, secure and **long-term R2 Low Rise Two Storey Residential suburb is under existential threat. They feel they would have to move elsewhere and some already have.**

8. ***Impact: Loss of character and amenity:*** The Planning Proposal **would fail** to meet a core requirement of the current Hunters Hill LEP, namely, achieving a strategic outcome that

"**Neighbourhoods Reflect Local Character**" and **fails to meet the Objectives of Section 4.2 of NSW Government's *Seniors Housing Design Guide (November 2023)*** *to reference the local character and urban arrangement, to acknowledge its surroundings (and) …"…**to compliment the existing surrounding built character."***

9. ***Impact: Loss of character and amenity**:* The Proposal would therefore **fail** to meet the Hunters Hill LEP's core principle of consistency with **neighbourhood amenity and streetscapes**.

10. ***Impact: Loss of Visual Privacy:*** It **fails** to meet the principle of protecting **visual privacy**. These proposed buildings would overlook their local neighbours, particularly in Barons Crescent.

11. ***Impact: Noise and loss of acoustic privacy:*** It **fails** to meet the principle of protecting **acoustic privacy**. These proposed buildings will generate noise over their neighbours who, themselves, may be heard in the new buildings.

12. ***Impact: Increased traffic noise and disruption:*** The Proposal would **significantly increase traffic** in an area with small, congested streets, already suffering multiple traffic issues in line with rapidly increasing housing and population density. The Planning Proposal states that **the Barons Crescent and High Street vehicle entry / exit points will be used equally. The impact on Barons Crescent residents will be excessive and unacceptable.**

    With around 300 workers at Montefiore, staff traffic, along with resident movements and service vehicles, will not only impact High Street and Barons Crescent but also Park Road and Gaza Ave as well as other Precinct streets and approach roads towards Ryde Road and Pittwater Road, particularly around shift changeover times.

13 ***Impact: Loss of amenity, traffic and disruption:*** The proposed **entry to the underground carpark** and Loading Dock in Barons Crescent (to be relocated further south than the current location) will likely cause **traffic disruption, stress, congestion and accident risk near the entry and in the narrow parts of Barons Crescent and the surrounding area for cars, buses and people.** This is a major concern for myself and other local residents.

14. ***Impact: Loss of amenity, traffic and disruption:*** Vehicles which are expected by access Montefiore via the **Barons Crescent carpark entry/exit** and will be forced to drive a longer and circuitous route through Park Rd, Blaxland Rd, Barons Crescent south / north or Gaza Ave. The potential disruption and danger in some of these narrow, congested streets is significant and obvious.

15. ***Impact: Increased pedestrian risk*:** The Proposal will increase **pedestrian safety risks in an aging population area**. Note that sections of Barons Crescent near Montefiore do not currently have a public footpath.

16. ***Impact: Loss of convenient parking:*** **It may increase local street parking issues**. Those occupying, working in or visiting the site may not choose to use the underground carpark if street parking is closer to pedestrian entries, particularly for Gaza Avenue and Building B.

17. ***Impact: Noise and loss of quiet enjoyment:*** **The Proposal may increase local noise issues** through car noise and general activity associated with an increased population of residents and workers. I am worried about car noise and traffic with late-night shift changeovers potentially using the Barons Crescent carpark entry/exit.

18. ***Impact: Light pollution and harm to wildlife:*** A significant issue is **light spill / pollution and possible mechanical noise (eg. HVAC Plant) from the high-rise apartments** – this will impact on local residents and local wildlife / fauna, for example possums, bats, reptiles and birds

such as nocturnal Tawny Frogmouths and endangered Powerful Owls which are known to live in the local remnant bushland, including that on the corner of Barons Crescent and Thorn Street.

19. ***Impact: Noise and disturbance to wildlife:*** Increased human and traffic activity and associated disruption is likely to **disturb existing nearby residents and impact on local wildlife.**

20. ***Impact: Noise, disruption and stress:*** The construction period could mean **at least two years of major disruption and parking problems** for existing residents with tradespeople, heavy vehicles, work and traffic control zones, significantly increased vehicle movements, noise, dust and run-off into highly sensitive bushland areas.

21. ***Impact: Harm to bushland and wildlife:*** The remnant **bushland block on the corner of Barons Crescent and Thorn Street** (directly opposite the proposed Building B) is a designated wildlife protection area and remnant bushland which **contains a mature ecological community of critically-endangered Sydney Turpentine-Ironbark Forest (7 trees)**. This remnant bushland is highly sensitive and vulnerable.

    The removal of a vast amount of soil and rock to excavate and build the 200+ vehicle underground basement, loading dock and carpark is expected to result in a **massive number of heavy truck movements** through our narrow suburban streets. **Potential impacts include disruption, noise, airborne dust plume / dust and dirt spill and mud intrusion into this fragile native bushland bordering Barons Crescent**.

22. ***Impact: Financial loss for residents / decrease in property values.*** It is possible that the loss of character and amenity due to the development and/or disruption during construction could impact on the value of their property or their ability to lease.

23. ***Impact: Extra load on infrastructure / service outages:*** The Montefiore Seniors Living Proposal **will add significant extra load and stress on the local area infrastructure and services** including electrical, sewerage, water, drainage, fire services, road repairs, public footpaths and gutters and other local services. There is a **risk of overload, damage or failure.**

24. ***Impact: Extra cost pressure on infrastructure and public services:*** **Who will pay** for the infrastructure upgrades, extra Council services or increased public property maintenance? Will Montefiore? Will the Council (and therefore Hunters Hill residents)? **Will ILU residents pay Municipal Rates or will the cost go to the ratepayers of Hunters Hill?**

25. ***Impact: Precedent risk impacting other sites and areas:*** The rezoning of this residential land to SP2 Infrastructure (Seniors Housing) would set a **major precedent within the Municipality** of Hunter's Hill (**and elsewhere across Sydney**) allowing building heights which are inconsistent with existing LEPs and local character.

    Other Aged Care Facilities in Hunters Hill and in other Sydney Municipalities may follow suit.

Part 5. Recommendations

The Montefiore Seniors Living Proposal PP-2023-1109 is not yet ready to proceed to the next step in the Gateway process.

KEY RECOMMENDATION

1. **The Proposal should go back to the Department for rectification and improvement before proceeding with the Gateway process.**

2. **The proposal should be amended so that:**

   - maximum building height along the Barons Crescent and Gaza Avenue frontages is 2 storeys;
   - maximum building height elsewhere on the Montefiore site is 3 storeys;
   - the entire site has a residential zoning and is consistent with the NSW Government's *Seniors Housing Design Guide* (November 2023) Medium Density ILU provisions.

It is also recommended that the Proposal should be amended following Public Exhibition to address the following:

1. **This submission has identified the following anomalies in the Gateway process:**

   a) at the time of Gateway Determination the **Planning Proposal failed to adequately meet the requirement to demonstrate site-specific merit**. This should have been corrected before proceeding but was not. **This inadequacy should now be corrected before the Gateway process continues.**

   b) **there are inadequate levels of clarity, detail, consistency and completeness** both within the Planning Proposal itself and between the Planning Proposal and its supporting documents (Appendices). It does not provide the Department and the Planning Panel with sufficient information to allow properly informed consideration and action relating to the proposed rezoning. **This inadequacy should now be rectified and revisions published before the Gateway process continues.**

   c) **Some things that were supposed to be done** following Gateway Determination (such as an updated and more reliable traffic study, public consultation and an independent heritage assessment) but have not been done. These **should be done before proceeding**.

   d) The **Department should ensure that the anomalies and inadequacies in the Gateway Process and the documentation to date are rectified** by the Proponent, then reviewed by the Department and publicly exhibited again before proceeding further with the Gateway process.

2. NSW Government LEP Making Guideline August 2023 states that **Site-Specific Merit should be properly demonstrated to "… identify the potential environmental, social, and economic impacts of the proposal and outline proposed mitigation measures and justification."** (p 73)

In particular, for Site-specific Merit **to be adequately demonstrated the proponent should**:

a) address the inadequacies listed under the heading Site-Specific Merit identified by the Council Reporting Officer Mr Steve **Kourepis** in his **Report to Hunters Hill Council** for Extraordinary Meeting (EM) 12 September 2023.

b) address the inadequacies underlying the 12 stated reasons listed in the Hunters Hill Council's resolution to reject the Planning Proposal at EM 12 September 2023 (click on https://connect.huntershill.nsw.gov.au/montefiore).

c) consider, then adequately review, identify, assess and ameliorate the potential site-specific impacts identified by the community and others, including the 25 significant impacts listed above in Part 2 of this submission.

3. **Reduce the excessive overall scale** of the Montefiore Seniors Living Proposal, and in particular:
4. **Reduce the maximum permissible height limit of all buildings along Barons Crescent to 2 (two) storeys** only, and **consistent with Montefiore's proposed 2 storey height limit of buildings along Gaza Ave.**
5. **Reduce the maximum permissible height limit to 3 (three)** storeys across the remainder of the site.
6. **Overall, the height, scale and bulk of buildings should be made consistent with Section 15.1 Objectives 15.1.1 and 15.1.2 of the NSW Government's Seniors Housing Design Guide (November 2023) for Medium density ILUs. (p102)**
7. The **permitted use of all buildings on the site should be restricted to Seniors Housing only** and not include housing or accommodation for non-seniors (including staff), ancillary facilities, allied health facilities, restaurants and the like.
8. **If the permitted use of Building B on Barons Crescent is changed from ILUs to Mixed-Use and not additional housing for seniors then that part of Lot 2 DP312298 should be excluded** from the Planning Proposal Legal Site Definition (PP Table 2), it should not be rezoned and **its Lot should remain as R2 Residential (it's existing zoning).**
9. The **RFS bushfire compliance requirements for Building B should be confirmed** and published before rezoning proceeds.
10. The **permitted use of Building B should be confirmed by the Department before proceeding further with the Gateway Process** and relevant documentation (including the Planning Proposal and Site Specific DCP) rectified accordingly.
11. **The Site-Specific DCP should be cooperatively reviewed, further developed and finalised by Hunters Hill Council with Urbis input.** The Council should take ownership and control of the document.
12. **Proposed minimum age conditions for ILU purchase** and occupation should be stated.
13. **The Traffic Impact Assessment Report should be revised** and based on an up-to-date and accurate local area traffic study to fully gauge the impact of the proposal on local traffic volumes and patterns.
14. The proposed heavy use of the **Barons Crescent carpark entrance** will cause excessive, dangerous and unnecessary traffic movements. Use of this carpark and Loading Dock

entrance should be restricted to deliveries and the High Street entrance used for all other entries and exits, including staff parking.

15. **Distance to and availability of local amenities, adequacy of public transport and the impact of aircraft noise** should be more fully considered by Montefiore and the Department.
16. An **independent site-specific infrastructure requirements assessment** and a **heritage assessment** on the site synagogue and WW2 bunker should be carried out.
17. **Public consultation should take place** as soon as analysis of submissions is completed after Public Exhibition and again when inadequacies have been rectified and relevant documents re-exhibited. **Public consultation should be widely advertised / publicised within the Municipality.**

Mr Bob Hayes
Local Resident and Member of the Montefiore Redevelopment Community Action Association Inc.

28 January 2026

PLEASE NOTE: I request that my address and contact details not be published, with the exception of my Contact Email, namely: hhcommunityaction@gmail.com

I would like to speak at the Planning Panel Meeting.

APPENDICES FOLLOW – SEE OVER:

Appendix 1 – Brief Summary of the Montefiore Senior Living Proposal

The Montefiore Seniors Living Proposal proposes to change the Hunters Hill Local Environmental Plan to rezone part of the current Montefiore site from R2 Residential zoning to Special Purpose 2 (SP2) Infrastructure (Seniors Housing) zoning, allowing the construction of more seniors housing, increased building height and higher density (floor space ratios).

More specifically, the proposal currently involves:

- One 1 storey and three Medium density 2 storey buildings along Gaza Avenue.
- A high density 4-storey (16M) building in Barons Crescent on the corner of Gaza Ave (Building A). The proposed permitted use is described as Independent Living Units (ILUs) in the Planning Proposal Appendix B Urban Design Report.
- A high density 4-storey (18M) building which fronts Barons Crescent (Building B) just south of the existing Synagogue opposite Thorn Street. The proposed permitted use has recently changed from ILUs and is now described as "Communal" in the Planning Proposal Appendix B Urban Design Report.
- Two high density 6-storey (24M) towers in the centre of the Site containing ILUs, and
- Construction of a 200+ vehicle underground basement and carpark with entrances in High Street and Barons Crescent (the latter entry also leads to the Loading Dock).
- The Proposal documents state that the proposed Masterplans are draft and indicative only. Details will not be presented until the Development Application stage.

If the SP2 Infrastructure (Seniors Housing) zoning change is approved, increased Floor Space Density will occur by:

- Reduction from 334 to 194 aged care beds (140 fewer aged care beds);
- Increase from 18 to 112 two- and three-bedroom ILUS and 21 units for staff in Building B.
- Increases in maximum allowed building height (up to 26 metres) and floor space ratio (FSR).

Appendix 2 – Statement of my Position re the Montefiore Seniors Living Proposal

- I do not oppose low-medium density redevelopment of the Montefiore site but do oppose high-density buildings in our quiet low density residential neighbourhood with limited street access, surrounded by an environmental conservation zone.
- Montefiore's site would be much more acceptable if:
  - maximum building height along Barons Crescent and Gaza Ave. frontage is 2 stories
  - maximum building height elsewhere on the Montefiore site is 3 stories.
  - **the entire site has a residential zoning and is consistent with the NSW Government's Seniors Housing Design Guide (November 2023) Medium density provisions.**

END

Submission Type

I am making a personal submission

Title

Mrs

First Name

Valerie

Family name

King

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

We oppose the proposed development at the Sir Moses Montefiore Jewish Home for the following reasons:-

1. The proposed building heights are too high and out of local character. If this massive redevelopment was allowed, it would set a dangerous precedent for oversized developments in other parts of Hunters Hill. The proposed size is excessive.

2. There would be an enormous increase in traffic. The building phase would be a nightmare with heavy machinery thundering past our house but, after completion, there would be an ongoing permanent increase in traffic as it is expected that the new residents

would have their own transport.
Council's own Boronia Park Precinct: Local Area Traffic Management Plan found Key Issues, including: Rat running; Traffic speeds and irresponsible driving; Pedestrian safety; and Parking.

yours faithfully

Peter and Valerie King
96 High Street
Hunters Hill

Submission Type

I am submitting on behalf of my organisation

Title

Mr

First Name

Bob

Family name

Hayes

☐ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Sydney

I have made a reportable political donation

No

☑ I agree to the Privacy statement

submission

I am submitting this submission as a Member of, and on behalf of the Association, Montefiore Redevelopment Community Action Association Inc. (MRCAA).

This is a seperate submission to my own personal Bob Hayes submission which was already submitted and receipt acknowledged last night.

Thank you.

Bob Hayes

Montefiore Redevelopment Community Action Association Inc. (“the Association”)

Contact email:
hhcommunityaction@gmail.com

28 January 2026

Mr Ian Woods and others
Department of Planning Housing and Infrastructure

Dear Sirs/Mesdames

Submission re Montefiore Seniors Living Proposal 2023-1109 (“the Proposal”)

The Association objects to the Proposal by Urbis on behalf of the Sir Moses Montefiore Jewish Home (“the Proponent”) to:

- rezone existing residential land as SP2 under *State Environmental Planning Policy (Transport and Infrastructure) 2021 (“SEPP Infrastructure”);*
- increase the floor space ratio of proposed new buildings; and
- construct four higher density buildings and towers on the site up to 24 m in height, or possibly the permissible 26 m allowed by the SP2 zoning sought.

The Association asks that the Proposal be returned to the Department for revision on the basis of accurate independent data, prior to re-exhibition.

Support for the Association’s position

We represent a wide section of the community in Boronia Park, Hunters Hill and Woolwich.

Sixty five people attended the second of two public meetings at the Uniting Church, Pittwater Road, Boronia Park on 23 August 2023 organised by the Association. It was publicised by flyers placed in letter boxes in all of Boronia Park and sections of Hunters Hill and Woolwich.

At that meeting, the following motion was passed unanimously:

> *The Association believes it is important for Council to hear the voice of the community. The committee proposes the following motion for resolution:*
>
> *“The meeting calls on Council to:*
> - *reject the Montefiore Planning Proposal, and*
> - *invite Montefiore to submit an alternative proposal consistent with a residential zoning of the site.*

Our position remains the same.

Insufficient information to enable assessment

The development described in the Proposal ’s supporting documents is unlikely to be consistent with a future development application, should the Proposal’s changes to *Hunters Hill Local Environmental Plan 2012 (“LEP”)* be allowed and development proceed. The Draft Indicative Masterplan (Figures 18 and 19 page 57 *Urbis Planning Proposal* and *Urban Design Report* (Appendix B) is described as “one potential design outcome for the site, noting that the ultimate (and detailed) design outcome would be the subject of future DA/s”. Regarding traffic and parking, it is stated, ”Further detailed analysis would be conducted at the DA stage, based upon the exact composition of seniors housing and associated facilities, together with detailed access, parking and servicing layouts.” (*Urbis Planning Proposal October 2025* page 61.)

The public cannot rely upon the reports supporting the Proposal as representing its final form. The reports repeatedly minimise or claim little impact from the development without supporting data. That is unacceptable.

The Development Control Plan does not provide enough information to assess the merits of the Proposal.

Summary of the Association's main objections

Overdevelopment of the site

1. The scale, height and bulk of all buildings A, B, C and D are too great, and grossly out of proportion with surrounding housing and residential zoning.

2. The proposed development has no relationship to the existing character of the neighbourhood of Boronia Park, or to the wider precinct of Hunters Hill. There are no four and six storey residential buildings in Hunters Hill other than social housing. They are not a part of the character and pattern of housing in the Local Government Area.

3. The proposal to build one or two storey buildings on Gaza Avenue in consideration of the residents opposite should be applied to the Barons Crescent buildings for the same reason.

4. The Proposal breaches relevant State government and local planning instruments. (See paragraph 49 et seq below.)

5. This Proposal is for housing, not infrastructure. A residential zone could allow scope for development which can comply with the applicable legislative and regulatory provisions in accordance with the guidance for low to medium density seniors housing in the *Seniors Housing Design Guide 2023*.

6. Housing above three storeys is inappropriate. The *Low and Mid-Rise Housing Policy* is part of the *State Environmental Planning Policy (Housing) 2021.* It changes planning controls to encourage more low and mid-rise housing to be built within 800 metres walk from nominated town centres and transport hubs (NSW *Low and Mid-Rise Housing Policy*: https://www.planning.nsw.gov.au/policy-and-legislation/housing/low-and-mid-rise-housing-policy). The nearest point of the closest town centre at Boronia Park is the commercial building on the corner of Pittwater Road and Princes Street. It is 1.14 km from the corner of Gaza Avenue and High Street, the closest point of the site of the Proposal. Hence that policy does not apply to the site.

7. However the *Seniors Housing Design Guide 2023* applies to the site. Buildings on the site should be no more than three storeys to be consistent with paragraphs 15.1.1 and 15.1.2 of that *Guide.* (See Conclusion D below, page 11.)

8. This overdevelopment creates unacceptable danger from bushfire to residents, despite assurances in the *Strategic Bushfire Study* (Blackash 30 September 2025), which ignore the medium density housing limitations caused by the risk of bushfire in *State Environmental Planning Policy (Housing) (SEPP (Housing)) (*sections 83 and 96). Planning regulations including *RFS Planning For Bushfire Prevention* acknowledge that bushfire risk to residential housing requires limitations on residential density. This Proposal does the opposite in land bordered by two cul-de-sacs and Bushfire Prone Land comprising Categories and 2 and 3 vegetation (see map in Urbis Planning Proposal page 15).

   Traffic

9. No reliable or independent traffic movement study has been conducted by the Proponent. The limited Urbis traffic study during afternoon peak hour was conducted during a Covid lockdown when there was very limited traffic. Rat runners turning east from Pittwater Road

into High Street who then turn right off High Street into Earl Street, Blaxland Street or Farnell Street would not have been counted.

10. There has been no traffic study by Urbis since June 2021. A Hunters Hill Council study shows that morning peak hour traffic on High Street towards Pittwater Road exceeds the limit of 300 car movements per day for allowing safe road crossing (Boronia Park Precinct *Draft Local Area Traffic Management Plan* (15 June 2021) p 11 Figure 5). 326 car movements occurred.

11. The figures in the *Transport Impact Assessment* page 31 are unreliable, given the deficiencies of the Urbis traffic survey. Recent additional buildings in Boronia Park will affect results from both studies, including the new sports and community facility at Boronia Park ovals, and the new work depot for council vehicles beside Boronia Park oval no 2.

12. Additional car use will be created by residents of 112 two and three bedroom independent living units ("ILUs") in Buildings A, C and D including 262 bedrooms (*Transport Impact Assessment, Urbis, 2025* page 24), and possibly approximately 21 x 2 bedroom staff units in Building B (*Transport Impact Assessment, Urbis, 2025* page 17).

13. There have been serious injuries caused by collisions within Boronia Park. Accident risks around points of pedestrian use, and at light and heavy vehicle access points and through routes to and from the site, will increase.

14. An underground parking and delivery entrance opposite 92 Barons Crescent will move all traffic far further into a quiet, low density street from the present entrance opposite 64 Barons Crescent. (See Figures 1 and 9 *Montefiore Hunters Hill Planning Proposal – Transport Impact Assessment* for locations.)

15. A second level of the underground car park has been either suggested or definitely asserted in the *Community Needs Assessment* (page 6), with an unknown extra number of spaces. Figure 11 *Proposed Lower Ground Level Plan* (*Urbis Planning Proposal October 2025* page 25) shows 178 basement car spaces, but the *Transport Impact Assessment* states:
"The Masterplan indicates the provision of 205 spaces at a single basement level and an additional 13 on grade (total 218). Notably this is an indicative figure that could be increased through the provision of an additional part basement level to meet ultimate parking demands."

    A second level of the basement car park would require excavation during initial construction. The intended number of basement floors of car park must be stated.

16. The net increase in parking spaces from the present 112 spaces on the site is not clear, since the number of proposed car parking spaces is also unclear. (*Transport Impact Assessment 2.1. The Site*, page 6.)

17. The Association is concerned that there is no accuracy or certainty in the documents and research supporting the Proposal about:
    - present numbers of car movements in Boronia Park,
    - the residential or other use of Building B.

18. The content of the *Transport Impact Assessment* cannot be relied on, as indicated by its disclaimer: "In preparing this report, Urbis was required to make judgements which may be affected by unforeseen future events, the likelihood and effects of which are not capable of precise assessment." Its conclusions should be regarded as speculative.

    <u>Transport and parking</u>

19. Car use will increase due to replacement of age care beds by two and three bedroom ILUs with car parking spaces. The *Transport Impact Assessment* quotes data that:
    "… the majority of workers (63 per cent) will drive private vehicles to the site. Another six per cent of those workers were driven to work. This reflects the limited public transport

connectivity and cycling connectivity to the site."
A study of resident driving found a similar result, the report noting the "… poor active and public transport connections in the local area" (pages 15 and 16).

20. Nothing in the Proposal promotes the use of public transport, as claimed. An available car park, if free, will encourage car use despite claims to the opposite (*Urbis Planning Proposal October 2025* page 53).

21. If the Proposal is approved and the consent authority for a development application also approves buildings of this scale, the construction phase alone will create a significant negative impact on the residents of Boronia Park, from noise, disruption and increased traffic. A development of smaller scale would reduce that impact.

22. The Association is concerned that there is no accuracy or certainty in the documents and research supporting the Proposal about:
    - the proposed number of new car parking spaces,
    - the possibility of an additional underground car park floor, and
    - the eventual number of car parking spaces to be sought by a DA.

Visual and acoustic privacy

23. Four storey buildings at the north of the site will overlook the low density residential housing on Barons Crescent. They will cause a grave loss of visual and acoustic privacy for Barons Crescent residents. A proposed fourth floor setback on Building B will make no material difference to that loss. Vision from the second and third floors alone will cause this problem.

24. Visual and acoustic privacy for the residents of the proposed new buildings has not been addressed. Compliance with the directives in *Hunters Hill Consolidated Development Control Plan 2013* has not been considered (paragraph 3.5.3 and 3.5.4).

25. Noise from the overhead flight paths (16R and 34L) to and from Sydney Kingsford Smith airport as a result of the projected increase in airport passengers by 75% by 2045 has not been mentioned. A comparative provision in the NSW *Low and Mid-Rise Housing Policy* excludes land which is within Australian Noise Exposure Forecast contour of 25 or greater, or Australian Noise Exposure Concept contour of 20 or greater. The 20 – 25 ANEF aircraft noise contour represents significant (Moderate Impact) aircraft noise for the affected residential community. The current *Sydney Airport Master Plan* (to 2039) contains an Australian Noise Exposure Forecast (ANEF) contour diagram which shows that the Montefiore site is immediately adjacent to the northern edge of the 20 – 25 ANEF zone which would require acoustic mitigation in buildings. A 75% increase in passengers, and therefore more flights, is likely to extend the ANEF 20 – 25 zone to include at least part of the Montefiore site.

26. The Sydney Airport website states:
    Sydney Airport by 2045 is expected to rise by 75% compared with now.
    72.6m Passengers Forecast to come through our terminals - up 75% from today.
    1.4m tonnes of freight expected to move through the airport – a 133% increase on today.
    *(*https://www.masterplan2045.com.au/*).*

27. The relevant Design Criterion states: "90. Any development within the 20 ANEF contour is to be constructed to comply with AS 2021:2015 Acoustics – Aircraft Noise Intrusion". NSW Government policy is that it is only conditionally acceptable to build in a 20-25 ANEF zone. Building is permitted but requires mandatory acoustic treatments (e.g., insulated walls, acoustic windows) to meet internal noise level targets. (See 2021:2015 (Acoustics—Aircraft noise intrusion—Building siting and construction)).

    There has been no consideration of this future negative impact on residents and the need to soundproof buildings to reduce that impact.

Bushfire risk

28. The *Gateway Determination* stated that the Proposal is to be updated to address consistency with NSW *Planning Direction 4.3 Planning for Bushfire Protection* and demonstrate justification for the Proposal. The Rural Fire Service advice dated 31 May 2024 to Urbis consultant Blackash was:
The proposal as a rezoning from R2 low density residential zone to SP2 Infrastructure (Seniors Housing) is required to demonstrate how the land can comply with Sections 4 Strategic Planning and 6 Special Fire Protection Purpose Developments of Planning for Bush Fire Protection 2019. The rezoning needs to demonstrate compliance with the setbacks for a new Special Fire Protection Purpose development. (Strategic Bushfire Study by Blackash 30 September 2025 page 9).

    Blackash asserts that the Proposal is able to comply with the NSW RFS *Planning for Bushfire Protection 2019* (*Strategic Bushfire Study* page 12). However, insufficient evidence has been produced to justify the risk of housing aged people in four and six storey high rise buildings in a fire risk zone.

29. The *Strategic Bushfire Study* asserts that adequate water supply is available, a conclusion which is not supported by the *Services Infrastructure Report*. The impact of increased population density on existing water supply has not been adequately addressed. The *Services Infrastructure Report* by Rowan Barwood/ Ty Huggins/ Jackson Bramley (Appendix C) provides little concrete information. The authors state:
*At this time, no discussions have been had with authorities for the project. The expectation is that once the risks and opportunities are defined and communicated to internal stakeholders, the strategy and approach to instigating discussions with external stakeholders will be developed. (*page 1).
While the authors expect resident water demand to be adequately serviced by the the present water main, they anticipate that water demand during bushfires will not be capable of being met:
Sydney Water may request that the existing connection to the main in High Street is used reduce cut ins, however we anticipate this would require amplification to provide sufficient pressure and flow for the site water demand and fire fighting purposes. This will be further determined upon application with Sydney Water for the Section 73 Compliance Certificate as part of the DA requirements. (page 13.)

30. The NSW *Low and Mid-Rise Housing Policy* does not apply on this site but it deals with bushfire risk in similar scale developments. It excludes bushfire-prone land which includes vegetation categories 1, 2 and 3. Vegetation categories 2 and 3 surround the site. The proposed four storey Building B has been assessed as subject to bushfire-prone risk. If the site were subject to the *Low and Mid-Rise Housing Policy,* those lots which have been assessed as Category 2 bush-fire prone risk would be excluded. Although the Proponent has excluded the lots where the RACF is located from the Proposal, it has not similarly excluded the lot(s) on which Building B is to be located. All of the bushfire-prone lots should be excluded from the Proposal.

31. By excluding the R2 zoned residential aged care facility (“RACF”) from the rezoning sought, the RACF will be subject to a different bushfire protection standard and design from the remainder of the site. Adopting different fire safety standards for the ILUs and the highly vulnerable aged care residents creates an inappropriate and unnecessary risk. The fire safety risk management framework should be the same for both the RACF and proposed ILUs. The RACF needs to be retrofitted and upgraded as noted in the *Strategic Bushfire Study* (page 37)*: The "do nothing" approach is not a viable option because it fails to address existing bushfire risks, outdated infrastructure, and non-compliance with modern building and planning standards. While the bushfire risk to much of the site is low, retaining the current site conditions may leave structures vulnerable to bushfire impacts, posing safety risks to*

occupants and emergency responders. Additionally, failing to upgrade the site can result in missed opportunities to improve resilience through better building materials, strategic landscaping, and enhanced access for firefighting efforts.
The *Strategic Bushfire Study* does not refer to the requirements of *Australian Standard AS 3959* which sets mandatory construction requirements for buildings in bushfire-prone areas, based on the bushfire attack level. It does refer to the construction of the basement car park from non-combustible materials such as concrete as “improving evacuation safety" during an emergency (page 11).

32. The applicable *Seniors Housing Design Guide* November 2023 requires reliance on expert reports to determine whether seniors housing can proceed on bushfire prone land with regard to Bushfire Attack Levels (BALs). The *Strategic Bushfire Study* does not provide BALs relevant to the site, maintaining they are not required for a planning proposal (page 66).

33. Reducing or preventing fire risk in the immediately surrounding vicinity has not been adequately considered. There is no information as to how greater population density in four and six storey buildings, and a two level basement parking would impact:
    - the fire risk for adjacent properties;
    - emergency access to and from the site;
    - emergency access to the surrounding homes and roads;
    - more onerous asset protection zone requirements for adjacent neighbours.

34. The Report’s conclusion that “The bushfire risk is not sufficient that development of the site should be avoided” is speculative (page 49). For example, all it would take to prevent rapid egress via Barons Crescent from the site would be a fallen tree across the road.

35. Once again, the actual situation is not stated, on the basis that: "a more detailed and comprehensive bushfire risk assessment will be conducted through the development of a Bushfire Design Brief (Report page 61).

Impact on the natural environment

36. Six storey buildings up to 26 m in height (allowed in an SP2 zone) and four storey buildings adjacent to Barons Crescent will create light spill on neighbouring residences and bushland, and affect nocturnal wildlife such as the many resident species of nocturnal insects, bats, microbats, owls, tawny frogmouths and echidnas. The land adjacent to the site on High Street and the land extending to the eastern end of the site beside an adjacent footpath is zoned E2 Environmental Conservation (*LEP* Land Zoning Map - Sheet LZN_001) comprising dense native bush land, home to many native species of birds and animals. Increased occupancy will impact this quiet environment. The parcel of bush on the corner of Thorn Street, owned by Sydney Water, will be subject to greater light and noise intrusion from Building B, and from the increased traffic on Barons Crescent. The E2 bushland zone south of the path beside the site extending past the end of High Street to the east will suffer from the increased density, particularly if six and four storey buildings are constructed.

Precedent

37. The Proposal’s use of an infrastructure zone for aged care residences would create a precedent for all other aged care homes in Hunters Hill, changing the character and amenity of the suburb, and changing relevant planning requirements. The precedent would not be confined to Hunters Hill.

Procedural anomalies and deficient justification of site specific merit

38. The LEP making process leading up to and following the Gateway Determination has not been followed in a number of instances. In particular, the Proponent failed to address site specific merit deficiencies both before the Gateway Determination, and following Gateway Determination but prior to public exhibition, as required by the DPHI’s *Local Environmental Plan Making Guideline*.

39. Instead, the Proposal relies on a recitation of relevant local government planning requirements with no plausible or reliable case for compliance, and unsupported assertions about access to and use of existing local facilities and facilities in Lane Cove.

40. Criticisms of the deficient case for site specific merit by Council at its Extraordinary General Meeting on 12 September 2023 largely still apply, particularly failure to assess both current and necessary future social infrastructure. The *Community Needs Assessment* provided fails to answer the criticisms raised by Mr Kourepis' Report to Council.

41. Community consultation has been inadequate, involving very few local nearby residents. Information distribution was very limited in scope (see page 22 *Urbis Planning Proposal October 2025*).

42. The Proposal has been significantly changed in an *Alteration of Gateway Determination* made on 7 November 2025 without explanation. The Legal Site Definition (Address / Allotment) of the affected Site subject to Proposal rezoning was changed to excise the residential aged care facility ("the RACF") at the eastern end of the site. This late alteration and the limited time since allowed for public exhibition has put the public at an unfair disadvantage when making submissions. Nor is this change taken into account by the Proposal's supporting documents completed prior to the *Alteration*.

43. The Gateway Determination identified that neither:
    - *Objective 7 of Greater Sydney Regional Plan - Communities are healthy, resilient and socially connected* nor
    - *District Plan Priority N4 Fostering healthy, creative, culturally rich and socially connected communities* -
    have been appropriately responded to for the purposes of Gateway determination. There has been no appropriate response since.

44. There is no evidence of how Objective 11 of *Greater Sydney Regional Plan - Housing is more diverse and affordable* is achieved. It is not credible to claim that the ILU accommodation will be affordable (page 8 *Urbis Planning Proposal* October 2025). The Planning Proposal states "The provision of contemporary ILUs on the Hunters Hill site provides a direct funding source for its age care building stock and services…", suggesting an emphasis on cash flow, not affordability. It is questionable whether the addition of ILUs increases diversity in housing stock in the Local Government Area. However, the reduction of aged care beds in the existing RACF from 334 to 194 (*Traffic And Access Report* page 17) reduces that category of diversity despite the needed statewide increase in aged care beds to reduce pressure on hospital beds.

45. The extent to which demand for ILUs as "ageing in place" seniors housing is wanted in Hunters Hill is not known or supported by any study or data other than population predictions and the *North District Plan*'s population extrapolations. The Urbis *Community Needs Assessment* 8 August 2023 offered the following unsupported view:
    The desktop review of currently available independent living units suggests there is relatively high demand for this type of housing in the suburb. (page 24.)

    The impact of the proposed loss of a substantial number (194) of residential aged care beds is unknown. Here again, there has been no evidence provided.

46. There is no evidence of how Objective 12 of *Greater Sydney Regional Plan - Great places that bring people together* is to be achieved or how the Proposal will provide public benefits for the community, despite the claim that:
    The Proposal has considered this objective and identified that the proposal has taken a place-based approach to planning, reviewing the actual local characteristics and infrastructure needs of a local place, and proposing mechanisms to secure needed public benefits for the community early, while respecting the desired low-density character of the area. (Urbis Planning Proposal page 41.)

The *Planning Proposal* does not specify the infrastructure needs which have been identified or the needed public benefits for the community. Nor does it propose mechanisms to secure those public benefits.

47. The *Community Needs Assessment* 8 August 2023 did not consider that the addition of 61 extra residents merited a quantitative assessment of the needs of the site, despite the proposed changed composition of its population. It claims that:
The incoming population of 61 people will not generate demand for any additional social infrastructure provision. Future residents will have good access to existing community and cultural facilities, libraries, medical centres, a private hospital, sport and recreation centres and a good network of open space including Boronia Park, a 24ha reserve, next to the site. They will also have access to on-site open space and allied health spaces.

    This surprising conclusion incorrectly equates the actions and needs of residents of the aged care beds with residents of the ILUs and is not supported by evidence. The only facility to which residents will have good access is Boronia Park bushland and open space.

48. The *Community Needs Assessment* contains no research or independent assessment of community needs and social infrastructure requirements generated by the development. Urbis relies on the assessment by Hunters Hill Council in its section 7.12 *Local Infrastructure Contribution Plan* and *Hunters Hill Community Plan 2022-2032* to identify the social infrastructure required for the Proposal.

Non-compliance with State and local government provisions

49. The Proposal fails to comply with the site specific merit provisions of State and local government law and policy, all of which emphasise the need to recognise and enhance the local character, pattern and identity of a neighbourhood, including the following objectives:

- *State Environmental Planning Policy (Housing) 2021*
  Schedule 8
  Design principles for seniors housing
  section 97
  1 Neighbourhood amenity and streetscape
  Seniors housing should be designed as follows—
  (a) to recognise the operational, functional and economic requirements of residential care facilities, which typically require a different building shape from other residential accommodation,
  (b) to recognise the desirable elements of—
  (i) the location's current character, or
  (ii) for precincts undergoing a transition—the future character of the location so new buildings contribute to the quality and identity of the area,
  (c) to complement heritage conservation areas and heritage items in the area,
  (d) to maintain reasonable neighbourhood amenity and appropriate residential character by—
  (i) providing building setbacks to reduce bulk and overshadowing, and
  (ii) using building form and siting that relates to the site's land form, and
  (iii) adopting building heights at the street frontage that are compatible in scale with adjacent buildings, and
  (iv) considering, where buildings are located on the boundary, the impact of the boundary walls on neighbours,
  (e) to set back the front building on the site generally in line with the existing building line
  …
  3 Principles of Policy:
  … (f) reinforcing "he importance of designing housing in a way that reflects and enhances its locality"

- *NSW Government Seniors Housing Design Guide 2023*
  4.2 Typology and scale
  Seniors housing as a specific type of development can introduce a different scale and form into a surrounding area.
  The modulation of the bulk and form of new buildings of larger scale than the surrounding context should reference the local character and urban arrangement to acknowledge its surroundings.
  OBJECTIVE
  4.2.1 To compliment [sic] *the existing surrounding built character.*
  4.2.2 To sensitively integrate a new development into its surrounding area and to ensure the building scale and form supports the local context and future character of the area …
  15.1 Neighbourhood amenity and streetscape
  OBJECTIVE
  15.1.1 To provide two or three storey housing clusters where the scale and massing is articulated and separated to respect the character and pattern of the suburban surroundings.
  15.1.2 To positively enhance the streetscape and uplift the quality of built form in the neighbourhood, and provide a landscape buffer to soften the development.
  (NSW Government Seniors Housing Design Guide 2023)

- *Hunters Hill Local Environmental Plan 2012* ("*LEP*")
  1.2 Aims of Plan
  (1) This Plan aims to make local environmental planning provisions for land in Hunters Hill in accordance with the relevant standard environmental planning instrument under section 3.20 of the Act.
  (2) The particular aims of this Plan are as follows—

  (a) to maintain and enhance the character and identity of established neighbourhoods in Hunters Hill by regulating the use and development of land …

The Proposal breaches these laws and principles. The proposed size, scale, design and impact of the proposed buildings on their surroundings bear no similarity to its immediate neighbourhood or any part of Hunters Hill other than social housing (which has been situated on appropriate land, largely separated from adjacent low density residential housing).

<u>Attempt to create new permitted uses in an SP2 zone</u>

50. Oddly, Urbis mentions aquaculture as a permitted use within an SP2 zone as a justification for adding "community facility and "restaurant and cafe" as permitted uses in that zone. Each category of infrastructure in *SEPP (Infrastructure)* has specific allowances for permitted developments, whether complying or requiring consent. However,"restaurant" or "cafes" are not permitted developments within any infrastructure category.

51. As examples, *SEPP (Infrastructure)* permits community facilities in a health services facility (*Part 2.2 General - Division 10*) and a railway corridor (*Part 2.2 General - Division 15 Railway Subdivision 1 Railways and rail infrastructure facilities).* Development of "food and drink premises (other than pubs or bars)" is complying development within an existing university (*SEPP Infrastructure* (*Part 2.2 General - Part 3.5 Universities—specific development controls).*

52. ancillary residential uses of its proposed buildings, taking advantage of the heights allowed within *SEPP (Infrastructure)* but adding uses not allowed in any SP2 zone.

Inappropriate zone

53. *State Environmental Planning Policy (Transport and Infrastructure) ("SEPP (Infrastructure")* is inappropriate for residential housing. It does not list residential housing as a category of infrastructure. Chapter 2 of *SEPP (Infrastructure),* entitled "Infrastructure" does not contain any provision identifying residential housing as infrastructure. The provisions of *SEPP (Infrastructure)* do not include or affect residential housing developments. To the extent that there is ancillary housing on any infrastructure site, the provisions of *SEPP (Housing)* apply to that housing.

54. Related legislative objectives do not include any reference to housing in an SP2 zone. The Land Use Table in the *LEP* describes the objectives of Zone SP2 as follows;
    Zone SP2 Infrastructure
    1 Objectives of zone
    • *To provide for infrastructure and related uses.*
    • *To prevent development that is not compatible with or that may detract from the provision of infrastructure.*
    • *To facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land.*

    SEPP (Infrastructure) paragraph 4.6 reiterates the first two LEP objectives regarding Zone SP2.

55. "Infrastructure" is not defined in *SEPP Infrastructure*. Its list of infrastructure types does not include any type of housing. The special characteristic of the site of the Proposal, and its intended use, is residential housing. *SEPP Infrastructure* is inapplicable in a residential context. The provisions of *SEPP Housing* apply to the extent of any inconsistency with any other SEPP (clause 8). However, *SEPP Infrastructure* contains a similar provision. The two SEPPs do not conflict, or overlap to create inconsistency, since they relate to entirely different types of development, reinforcing the fact that the *SEPP Infrastructure* does not include housing as infrastructure. Housing in an infrastructure zone can only be ancillary to the purpose of the infrastructure, such as housing in a correctional facility.

56. Clause 79 of *SEPP (Housing)* lists prescribed zones to which it applies (including SP2 Infrastructure), covering any associated housing built in a legitimate infrastructure zone. It is not clear why the Proponent regards the *SEPP (Infrastructure)* height limits as applicable to housing within an SP2 zone. Clause 108 of *SEPP (Housing)*, which imposes non-discretionary development standards for ILUs would apply to housing in an infrastructure zone, thus applying the height limits that clause imposes, namely, 9.5 metres plus a 2 metre allowance for servicing equipment (and any additional government density changes). The Proponent and the Department have not addressed this issue.

57. The reasons offered for the use of SP2 zone are insufficient or incorrect. An SP2 Infrastructure zone should not be applied to the site because:

- the site is already zoned in way which permits (and is used for) seniors housing and it is not proposed to use the site for a purpose other than seniors housing;
- according to the Proposal, it is not proposed to use the site for infrastructure of any kind;
- rezoning the site as SP2 Infrastructure where there is no infrastructure planned for the site is not appropriate;
- rezoning the (now less than entire) site *SP2 Infrastructure* with the building heights specified has the effect of permitting Montefiore to construct buildings to various heights, some of which exceed what would be permitted under a more appropriate rezoning of the site appropriate for the character of the neighbourhood;
- rezoning as SP2 Infrastructure should not allow the Proponent to exceed the limits which would apply in a residential zone;
- there is no support for rezoning residential land as infrastructure in the Department's *Practice Note Zoning for Infrastructure in LEPs* (PN 06-002; PS 09-011). It makes no reference to allowing a change from a residential zone to an infrastructure zone. Principle 1.2 states: "It is

established practice to refer to the zoning of adjoining land when seeking to establish an appropriate zoning for land.", and that this is "… a basic planning principle of aligning land uses." The adjoining land is zoned R2 Low Density Residential, not infrastructure;

- an SP2 Infrastructure zone achieves no greater security or consistency for future development than a medium density housing zone. *Urbis Planning Proposal October 2025* states that *SEPP Infrastructure* is consistent with the proposal because:
  "*The SEPP provides a consistent planning regime for the provision of infrastructure and services and prescribes requirements for consultation with relevant public authorities during a future DA process. The provisions of the SEPP will be addressed in future DA/s."* (page 48).
  The consultation required by *SEPP Infrastructure Part 3.2 General* is not part of a DA process. It requires notice to be given to a relevant authority, such as a council by public authorities who are entitled to carry out development *without consent* under the terms of *SEPP Infrastructure,* or where the development is exempt or complying development. It has no relevance to a private development application.

Conclusions and recommendations

A. (i) The Proposal is not supported by independent recent research and data relevant to the site.
(ii) The Proposal provides no clarity or certainty as to what eventually will be sought under a development application.
(iii) It is uncertain whether buildings A, B, C and D will proceed at their currently indicated size and location, and whether their current indicated uses will remain.
(iv) Completion of further necessary studies and comprehensive plans should be followed by further consideration by the Department, then further exhibition.

B. The deficiencies in the Proposal necessitate further work to support any change of zone which would allow new buildings and greater occupation levels. In particular:
- the site Masterplan is so vague and uncertain to be of little use in assessing the Proposal
- the traffic study is inadequate and its data is wrong
- the *Strategic Bushfire Study* is inadequate and provides no reliable conclusions
- changes in and uncertainties regarding permitted use of buildings are unacceptable and have potentially significant implications (eg. traffic and parking).
- some infrastructure requirements of the Proposal are unclear, or are inadequate eg available water supply during a fire.

C. A residential zone is required under the applicable planning principles and laws. An SP2 zone is not appropriate.

D. Buildings on the perimeter of the site on Gaza Avenue and Barons Crescent should be no more than two storeys in height. Other buildings on the site should be no more than three storeys to be consistent with the *Seniors Housing Design Guide 2023*. In particular, the Proposal should comply with relevant planning provisions (see paragraph 49) and, in particular, observe the following objectives of the *Guide*:

> OBJECTIVE
> 15.1.1 To provide two or three storey housing clusters where the scale and massing is articulated and separated to respect the character and pattern of the suburban surroundings.
>
> 15.1.2 To positively enhance the streetscape and uplift the quality of built form in the neighbourhood, and provide a landscape buffer to soften the development.

Yours sincerely

Bob Hayes
Member,
Montefiore Redevelopment Community Action Association Inc.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Email

[redacted]

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submission

Please refer to my response "Planning Proposal PP-2023-1109 Montefiore Seniors Living [redacted] aza Avenue response)

[redacted]Gaza Avenue, Hunters Hill NSW 2110

28th January 2026

New South Wales Government
Department of Planning and Environment

Re: Response to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal

Please find my comments relating to the Montefiore Seniors Living Proposal PP-2023-1109.

- I do not give support to the proposal due to errors and inconsistences within the supporting documentation of the Planning Proposal, this being for the reasons detailed below.

PLANNING PROPOSAL

Reference: Prepared by Urbis – dated October 2025 – Project P0029427-2

In the Executive Summary quoted "Removes on Street Parking" (refer to Page 7) refers to *Gaze Street*.

Note: Should the reader assume that Gaze Street is Gaza Avenue?

- **Social Infrastructure** (Page 63)

The Social Infrastructure section refers to the terms "***Wider community"*** *and* ***"broader community****"*. which has not been defined within the context of the report.

The query relates to the Social Impact Assessment prepared by Urbis which relates to the Allied Health offering for incoming needs. The statement: "Consider also making these spaces accessible to other organisations, services, groups or the wider community to contribute to the provision of social infrastructure for the broader community. "

> ***Wider community"*** *and* ***"broader community****"*.
> These terms need clarification as "wider community" may incorporate: -
>
> - the neighbouring residential blocks surrounding the Montefiore Home
> - the family and friends of the Montefiore residents
> - the residents living in the Hunters Hill, Ryde and Lane Cove Municipalities.

If the "wider community" and "broader community" encompasses all or part of the above, the Planning Proposals support documents should incorporate the additional vehicular traffic movements and parking arrangements for all the proposed allied health services.

URBAN DESIGN REPORT

[2.2 Proposed Draft Masterplan – Page 9] refers to Gaza Street.

Noite: Should the reader assume that Gaza Street refers to Gaza Avenue?

SERVICES & INFRASTRUCTURE REPORT

- Stormwater Catchments (Page 18)

Comment: The flood study states that "Shallow flood from 10mm to 300mm is observed along Gaza Avenue", in my opinion is incorrect. We have been long term residents in Gaza Avenue for 30 years and have never experienced such a rain event which could be classed as shallow flooding. From our experiences it is very unlikely that a water depth of 10mm or greater could be achieved due to the gradient of Gaza Avenue. The stated 10mm level is quite low and may possibly occur in the gutter or footpath, however this has not been observed by us in Gaza Avenue and on the roadway.

PRELIMINARY ARBORICULTURAL ASSESSMENT
Reference: Prepared by Arterra dated 2 February 2023

Comments:

We have observed from our Gaza Avenue property that the leafy large figs tree canopy on the Montefiore site has significantly reduced over the past decade. We hope that no more large significant trees are removed.

The Arborist Report states that the Cook Pine and the Bunya Pine located within the Montefiore heritage garden are considered to have a high retention value. These trees are significant due to the grand and majestic, towering height and of healthy appearance.

The Bunya Pine located to the left of the High Street primary entrance and behind the rear fenceline border of No.2 Gaza Avenue (marked by yellow circle) does not appear to be noted within the preliminary landscape assessment. This Bunya Pine has produced large cones of nuts over the past decade; therefore, the fruiting event confirms that the tree's age exceeds over 100 years.

The Bunya Pines should be protected from any construction projects as its lifespan is up to 600 years. Additionally, Bunya Pines are of significance to Indigenous people.

The significant height of the Cook Island pine within the heritage garden enables sighting from viewing points along Burns Bay Road, Boronia Park Oval (below left) and from locations around Hunters Hill.

Above: Cook Island Pine and Bunya Pine on right.

PROPOSAL – TRANSPORT IMPACT ASSESSMENT

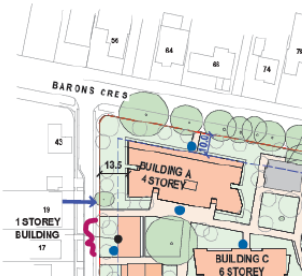
Reference: Prepared by Urbis – No. P0037645 Final report – dated 30th September 2025.

- **3.2 Vehicle Access Report (Page 18)** states that all driveways associated with the existing Montefiore owned, standalone residences, on the boundary of Gaza Avenue (except for No. 2 Gaza Avenue) will be removed.

- **Figure 9 The indicative structure plan for the site (Page 18)**
  Note: The Transport Impact Assessment [Figure 9-Indicative Structure Plan for the Site] and the DCP [Master Plan-Figure 2 Page 7] displays that there is an entrance to the 1-storey Communal building (opposite No. 17 & 19 Gaza Avenue) has an entrance via Gaza Avenue.

  The report does not state what the vehicle access and parking arrangement is for the 1 storey Communal building fronting Gaza Avenue. No building usage information, nor the location of parking and its impact on Gaza Avenue residential parking?

Figure 9 Indicative structure plan of the site



- **2.3.4. Traffic Volume (Page 11)**

  Midblock traffic volumes were collected in June 2021; the period greatly affected by Covid health regulations which changed visitation and traffic movement patterns for the site. Therefore, the traffic study does not accurately represent traffic movements of the years 2022 to 2025.

  Note: Sampling of traffic volumes from the High Street cul-de-sac to the roundabout located at the at Park Road intersection has not been included and made available.

  Montefiore site workers, contractors and visitors create large volumes of traffic along this section of road, especially before, after and during the shift change over times. It is common to experience queuing during morning and afternoon shift changeover, where bottlenecks are created preventing two-directional traffic movements due parked cars and the narrowness of High Street.

  There Traffic Impact Assessment should be noted as being incorrect and requires review.

DEVELOPMENT CONTROL PLAN (DCP)

Upon reviewing of the Development Control Plan several inconsistences can be highlighted; noting that the plans listed below either include or exclude the property known as No.2 Gaza Avenue.

There is an inconsistency of building footprint between the plans provided which refer to No.2 Gaza.

The site plans listed below exclude No. 2 as part of the Development Control Plan:

- 2.1 Masterplan – Figure 2 [Page7]
- 2.2 Set Back - Figure 8 Access Plan [Page 8]
- 2.3 Landscape Plan – Figure 5 [Page 10]

The site plans listed below include No. 2 within the DCP and include it in Building G3 footprint; a review is required as these may not be accurate:

- 2.3 Open Space Plan - Figure 6 [Page 11]
- Tree Preservation Plan - Figure 7 [Page 12]
- 2.4 Parking & Vehicular Access Figure 8 [Page 13]
- 2.7 Building Envelope Plan - Figure 11 [Page 16]
- 2.8 Building Height Plan - Figure 11 [Page 17]

2.5 Architectural Expression – Figure 9 - Building Articulation [Page 14]

- The Figure 9 - Building Articulation montage presents a realistic view of the proposed buildings which are located within the Montefiore campus and heritage garden zone.

  Note: Building Articulation photo montages should also be presented for the Gaza Avenue and Barons Crescent building. Without these, residents cannot make a valued judgement of the proposed design.

  The Planning Proposal should include an Architectural Plan and montage of what the Gaza Avenue view will look like. All proposed built structures need to look domestic when viewed from Gaza Avenue and Barons Crescent as well as presenting the same appearance and ambience as for the façade facing the heritage garden.

COMMUNITY AND STAKEHOLDER ENGAGEMENT OUTCOMES REPORT

Reference: Prepared by Urbis – dated 3rd February 2023 – Report No. P0039427-1

The Community and Stakeholder Report has presented montages to show what the proposed building façade appear like from within the internal heritage garden area.

Note: Site images or montages have not been provided for the 2-storey and 4-storey buildings proposed for Gaza Avenue and Barons Cresent. Gaza Avenue and Barons Cresent residents who live opposite the Montefiore site, and who are directly impacted by the development cannot make a valued judgement when minimal documentation is provided.

LANDSCAPE PLAN

The Landscape Plan should incorporate the planting of an avenue of tall fast growing, compact and non-evasive leafy trees along the length of the Gaza Avenue boundary of the Montefiore site.

SOCIAL IMPACT on GAZA AVENUE RESIDENTS

Below is detailed a list of points which are negative toward the Planning Proposal.

- The residents of Gaza Avenue will be directly impacted by all aspects of the development due to the proximity of private residences located opposite to the western side of the Montefiore construction zone.
- Gaza Avenue is a narrow roadway where 2-way traffic movements and passing is achieved by pulling up into driveways or onto the raised street parking zones.
- There are no established street trees to soften the view of the construction zone. Trees cannot be planted on the council strip due to buried underground services.

Approval of the Planning Proposal will result in considerable negative Social Impact on the residents who live in properties located in Gaza Avenue, including the surrounding streets of High Street and Barons Crescent for the duration of the construction project.

Description
Building A [4 Storey ILU]
Building B [4 Storey ILU]
Building C [6 Storey ILU]
Building D [6 Storey ILU]
Gaza Street G1 [2 Storey ILU]
Gaza Street G2 [2 Storey ILU]
Gaza Street G3 [2 Storey ILU]
Gaza Street G4 [2 Storey ILU]
Pavillion

Residents will experience significant negative impacts for the estimated 2-5+ year duration of the construction project. The Planning Proposal does not incorporate any staging plans for the whole Montefiore site nor for Gaza Avenue (refer to table). The assumption is that there will be many unbearable years where residents need to endure the noise, dust particles, the parking issues created by construction traffic, heavy vehicles manoeuvring and mechanical noises.

No noise mitigation strategies have been provided, no social impact reports have been provided.

Construction Impacts on Gaza Avenue residents

No documentation has been provided for the management strategies for the negative impacts of:

- Construction and heavy vehicle traffic movements which relate to the demolition, excavation, soil, contaminants, and removal of rubble.
- Overhead crane delivery, excavation & delivery of building materials and removal of building waste.
- Management of Construction noise relating to excavation for provisioning of underground carparks.
- Noise relating to construction work and use of hammering, drilling, and mechanical equipment and associated effect of vibration on nearby properties.
- Noise created by beeper alarms from heavy vehicles and construction machinery.
- Exhaust fumes generated by cars, trucks (prime movers with trailers) and construction equipment
- Artificial light spill generated by worksite spotlights during low light periods
- Uncertainly of which days of the week construction work will be approved for this project.

Overhead Cranes

- No reference is made to the Overhead Crane swing zones.

It is paramount that the swing paths do not travel over the Gaza Avenue residential properties which are opposite the Montefiore facility.

Mechanical Motor Noise from Built Structures

Noise pollution from building air conditioning installations can produce constant mechanical or humming noises which can be heard in nearby residential properties. The proposed development's air conditioning system to be per standards compliance and not directed toward Gaza Avenue residential properties.

Management of Fumes from underground carpark

- No environment report has been provided to indicate if an exhaust extraction system is being installed for the underground carpark and where the exhaust outlet will be located.

It is paramount that filtering of exhaust fumes takes place and not directed toward residences outside Montefiore boundary.

I have reviewed the documents provided within the Planning Proposal PP-2023-1109; please consider my response detailed above. I note that there are inconsistencies within the published reports. There is a lack of reporting and detail relating to Social and Environmental Impacts on residents and the wider community living alongside the Planning Proposal PP-2023-1109 location, therefore I am unable to fully support the project due to missing detail.

[redacted]

[redacted]**Gaza Avenue**
Hunters Hill NSW 2110

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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MONTEFIORE SENIORS LIVING PROPOSAL NUMBER PP 2023-1109
I OBJECT TO THE PROPOSAL.
THE REASONS WHY I OBJECT ARE SET OUT BELOW.

I live opposite Montefiore Home in Barons Crescent.

I REALLY OBJECT TO THIS MONTEFIORE SENIORS LIVING PROPOSAL.

I have lived in this one house for over 60 years.

When I built this house there was almost nothing else in the street.

We built here because of its peace and quiet and seclusion. And for the beautiful bush and the birds.

My privacy and peacefulness is terribly important to me.

If they build a 3 or 4 storey building across the road I will totally lose my privacy. My bedroom is at the front of the house facing the street. I will have to have my blinds closed 24 hours a day.

I wont be able to sit in my front garden.

I have poor mobility – can't walk much. I will hate that feeling of being hemmed in or being watched.

I can only imagine how this will change the neighbourhood – instead of being a quiet street there will be lots of cars coming and going from the new car and truck entrance right near me. There will be beep beep beep reversing at 6 o'clock in the morning that will ruin my sleep.

The light from the building will probably go on all night so I'll have to get block out blinds. I like the curtains I already have.

It will be much noisier too.

The way I live my life will be changed whether I like it or not.

The buildings along Barons Crescent should just be the size they currently are over the road – 2 storeys.

In fact the buildings in the whole of Montefiore should be as they are now - also 2 storeys.

That fits in with what this neighbourhood is like – it's quiet residential and no more than 2 storeys. It's got lots of character. That's why people came here.

It needs to stay that way. I don't want it to change and to look and feel like I'm somewhere else.

I'm sure I'm not the only one that feels this way.

Please don't ruin the beautiful quiet neighbourhood around here.

Yours faithfully

[redacted]

Submission Type

I am making a personal submission

Title

Dr

First Name

Anthony

Family name

Keane

☐ Name withheld

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In general I'm in favour of the development if it will increase the capacity to care for our older citizens given that the site already functions as an ACF. I would like to think that provision for less well off members of the community to have access to care in the facility has formed part of the approval process. I'm concerned about the impact on the amenity of local residents particularly increased noise and traffic volumes on local streets that are already subject to excessive speed and rat running at peak periods and frequent, inappropriate use by large, heavy trucks which will inevitably be worse during the construction period. I would request further consultation with local residents about a thorough and transparent traffic management plan from the proponents of the development and from Hunters Hill council.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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[redacted]

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Please see attached.

Attention Ian Woods and Louise McMahon
Planning Proposal Authority Team

Our reference: PP-2023-1109
Under-Exhibition-Montefiore Seniors Living Proposal
116-120 High Street, 2-20 Gaza Avenue and 45-47 Barons Crescent Hunters Hill

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This email is to be regarded as a submission to you of our objection to the above planning proposal which seeks to amend the Hunters Hill LEP 2012 to:

- **Rezone Gaza Avenue from R2 Low Density Residential to SP2 Infrastructure (Seniors Housing)**
- **Increase the maximum height of building (HOB) for part of the site from 8.5m to varying heights of 16m, 18m, and 24m**
- **Increase the floor space ratio (FSR) for Gaza Avenue from 0.5:1 to 1:1**

The reasons for our objection to the Montefiore proposal are as follow.

We are residents of 3 Gaza Avenue, Hunters Hill where our family has resided since 1949 when our parents (WW2 veterans) were allocated a newly built War Service Home in Gaza Avenue, along with other veterans' families who moved in at the same time, some of whose families are also still happily residing in the street, as too are other long term neighbours of ours.
We will obviously be affected by this Proposal if passed by your Sydney North Planning Panel, so we ask that the following be respectfully considered by your Panel when making your decision.

Local Character Impact
We believe this Montefiore proposed redevelopment of the Nursing Home site will change the character of our neighbourhood and thereby devalue the properties on the other side of Gaza Avenue where we reside. We will lose the benefits of the feeling of open space around us due to the scale, mass and density of the proposed joined Independent Living Units (ILUs) opposite us if the floor space ratio is increased from 0.5:1 to 1:1. Additionally, our existing views and visual harmony of the open skyline and greenery will be dominated by several high rise unit complexes, presenting us with bulk and massing, inconsistent with the surrounding streetscape.

This is incompatible with the local character of our street of separate houses on single housing blocks. The proposed redevelopment is not in a commercial area or on a main road, it is in an R2 Low Density Residential neighbourhood mix of families with children, the middle-aged and the elderly, surrounded by Boronia Park and children's playgrounds, and home to numerous birds, owls and other wildlife who nest in the existing tree canopies of Montefiore and the bushland of the Park. The proposal fails to respect local streetscape, residents' enjoyment of outlook, or the current low density zoning and it will have a significant impact on us.

Late last year, URBIS Engagement (acting for Montefiore) circulated to our letter-box their URBIS Update on the "**Montefiore Hunters Hill Planning for the Future Proposal'** dated November, 2025 illustrating their proposal (see attachment). But we now see from your website that they have changed their drawings to join together a longer line of ILU's along Gaza Avenue instead of separating them into smaller groups with space between them as was depicted in their brochure dated November, 2025. It appears that we will now be looking at a longer line of ILU's with no visual relief or greenery between them if this proposal passes. Nor do we have any idea of the number of people who will be residing in the proposed ILU's in Gaza Avenue, if this is approved, and this has a bearing on the number of extra cars (and their visitors) coming to the area.

Road, Traffic and Parking Congestion

This development proposal will greatly increase the road congestion we have been experiencing for years. Montefiore Nursing Home's employees' and visitors' cars already clog the narrow streets of Gaza Avenue and High Street and this will only bring more vehicles owned by the new residents living in the proposed ILUs and in the high rise unit blocks along with their visitors, more staff, trucks and deliveries, etc. needed to cater for the extra residents living there.

We highly doubt Montefiore's contention that their new underground parking arrangements will be anywhere near enough to take more of "their" cars off the surrounding streets. Most of their employees don't park inside the Nursing Home now – we don't know if their policy only allows for preferential parking, but this appears to be the case. The larger number of cars coming into our area if this development proceeds poses a major concern for residents of Gaza Avenue and High Street.

Anyone who visits the area during weekdays will see how congested are the surrounding streets, overflowing with cars parked either side of High Street all day, and sometimes almost down to corner of Park Road. You take your life into your hands now when exiting Gaza Avenue via High Street as one cannot see what is coming either way in High Street because some of these drivers continually disobey the Yellow lines and no parking signs at the intersection at the corner of Gaza Avenue and High Street, inhibiting vision of oncoming vehicles in both directions. (see attachments)

Several years ago Gaza Avenue residents had to petition Council to make our street: parking on one side only because the narrow road made it impossible to access some of our driveways when staff and visitors' cars from the Nursing Home were parked on both sides of our street. Council agreed to our request and initiated parking on one side of Gaza Avenue only. This restriction remains in place today and must be retained.

It is also very difficult for parents with young children to use the Council playground in High Street opposite Gaza Avenue on weekdays because all the parking spaces are continually occupied by employees of Montefiore Nursing Home, nearly all the way down to Park Road on both sides of High Street.

Loss of Our Amenity

I note that Montefiore's application seeks "to capture the positive health benefits of nature" in their landscape approach, but we, the existing residents of Gaza Avenue will lose out on those positive health benefits of nature when we are confronted with high rise apartments and bulk lines of joined 2 storey ILUs opposite us.

We also want to "Age in Place" as well – in our own home, in our own street, and in our own community free of the upheaval to our lives these significant changes will bring.

If this Proposal is passed, it means the residents of Gaza Avenue in particular, as well as the residents of High Street and surrounding local streets will be subjected to years of construction causing major disruptions, even more parking problems, traffic control zones, movement of heavy vehicles and tradespeople, as well as the noise and the dust resulting from the excavation for the underground carpark.

Setting a Precedent for Future Development

If this proposal passes it could set a dangerous precedent for future developments across the Hunters Hill Local Government Area, thereby changing the unique character of Hunters Hill as a garden suburb with many historical homes, and giving the go-ahead for similar high rise structures In other R2 Low density zones in our suburb and elsewhere.

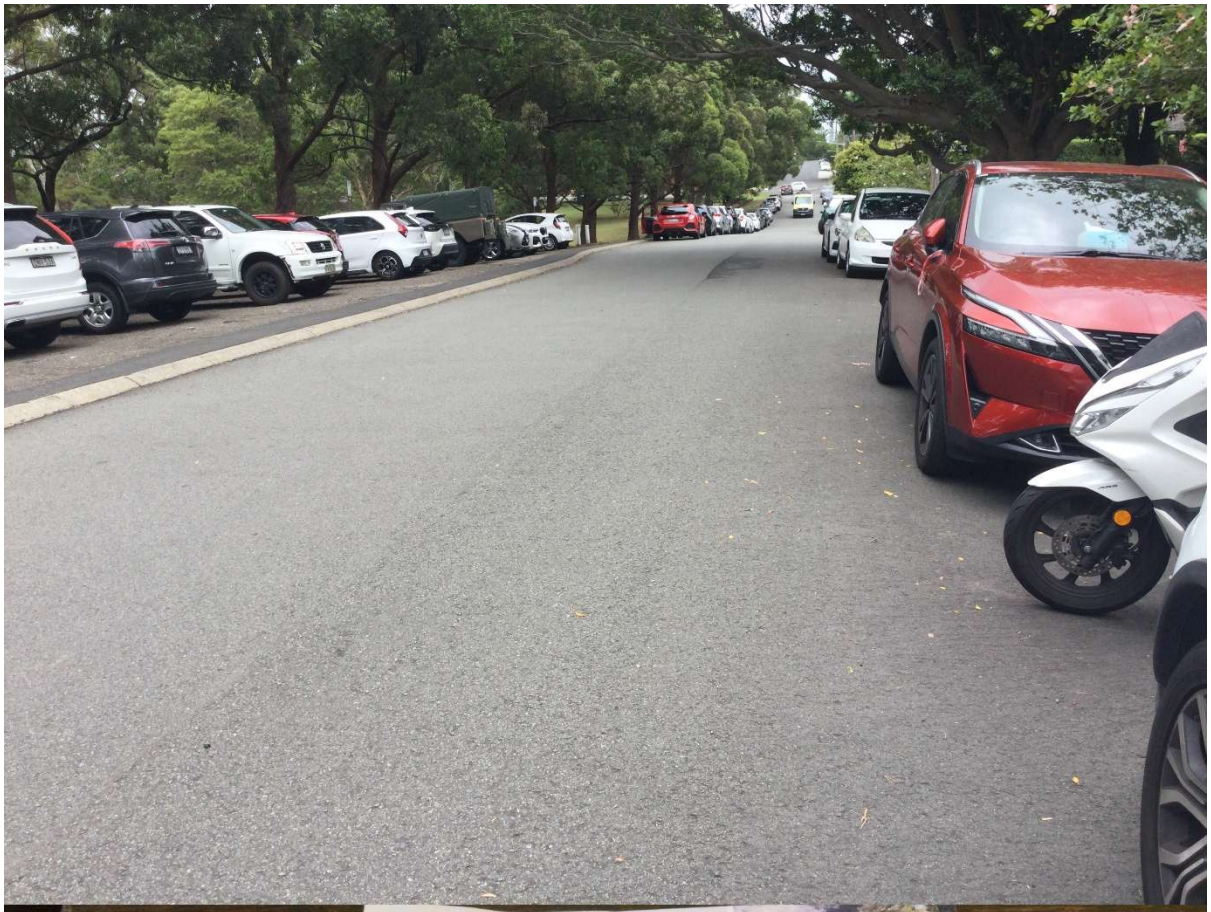
This is how it begins!

And for this and all the above reasons, is why we are respectfully objecting to the Montefiore Planning Proposal via this Submission. We believe the proposal is too big and out of context for the size of the site, its location, lack of parking, plus the fact that the Floor Space Ratio (FSR) of the R2 Low Density Residential Zone of Gaza Avenue , if approved will be increased, is unfair to the existing and long term residents of Gaza Avenue.

Thank you for your consideration.

P.S. In a conversation with Mr Ian Woods of
Your Department of Planning on 16th January, 2026
He advised me that I could lodge our Objection to
Montefiore's Proposal via his email address
(this one) which he gave me, rather than on the
Department's website.

Would you please email us back an acknowledgement
Of your receipt of our submission.
Thank you.



URBIS

UPDATE:

MONTEFIORE HUNTERS HILL PLANNING FOR THE FUTURE

NOVEMBER 2025

This newsletter provides an update on the Planning Proposal for the Montefiore site at 120 High Street, Hunters Hill. It also outlines the next steps.

The Planning Proposal is not a development application (DA). Rather, the Planning Proposal seeks to establish site-specific controls for the future re-development of parts of the site for new seniors housing. Should the Planning Proposal be approved, a subsequent DA will be prepared allowing further consultation with the community on the specific details of the project.

An indicative Site Concept Plan is included within the Planning Proposal, along with a site-specific development control plan (DCP) – refer to this Concept Plan below.

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

This submission is about Montefiore Seniors Living Proposal – PP- 2023-1109.
I object to the Proposal.
The reasons for my objection are as follows.

My family and I live in our house in Barons Crescent. We will be seriously impacted by the proposed Montefiore redevelopment and buildings of 4 storeys or more.

Our house is well below road level - like many houses on the east side of Barons Crescent. The land where a building is to be built is right opposite and is on high ground. So a 4 storey building is going to look much higher than that and the occupants are going to tower over and look down on our house and our enclosed front yard (we built the fence for greater privacy). Our privacy will be destroyed. Our 3 bedrooms face the street and the people in the building will see straight in. Our private, quiet and secluded amenity will be a thing of the past.

Our son has a condition whereby he becomes extremely agitated and anxious when woken by loud cars or trucks. I hate to think what it will be like when we have the Loading Dock entry within 50 metres or so and trucks arriving before he wakes up. Cars will frequently come and go late at night because staff and others will use this entrance. Shift changeover “rush-hour” will be hell!

Backing out of our steep driveway onto the street is already always dangerous as cars, trucks and buses fly around the Barons Crescent corner at Thorn St and we can’t see them coming. If cars are parked outside our house (which is quite likely) it will be almost impossible. There will be many more cars and trucks driving along Barons Cresent towards the carpark / loading dock entrance . This is going to be quite disastrous.

I honestly don’t know how we and others (like our very elderly neighbour) will back out without getting wiped out. This Montefiore Proposal is inadvertently making a dangerous activity even more dangerous. We are very concerned for our safety. All these vehicles will also be driving along other local streets to reach Barons Crescent whereas the current vehicle High Street entrance makes so much more sense. High Street is wider and the route is short and direct. I really object to this car and truck entrance in Barons Crescent!

The light spill from the building across the road will be very intrusive. Light from Montefiore already does bother us and illuminates the inside of our house as we have a lot of glass. The new four storey building will be literally next level. No privacy by day – no darkness at night. The creatures in the nearby native bush won’t appreciate it either.

We have lived here since the 1970s. We love the area which is characterised by being a quiet, low-rise, bushy haven where nature predominates and people live in harmony with it. The neighbourhood has a very distinct character which should be treasured and preserved. It has kept its quiet integrity despite the growth in population. This area is already near its limits though - so many more cars are parked on the street because nearly every house has at least 2 cars and many people work from home. It is very difficult to avoid oncoming cars in Barons Crescent - it is virtually one lane. It well get a whole lot busier and more chaotic under this proposal.

Overall, the proposal is too grande – too many people, too many cars, too big and too high. The buildings along Barons crescent should be like the buildings along Gaza avenue – 2 Storey limit. The other buildings in the site should be no more than 3 storeys. The zoning of Montefiore should stay as residential in keeping with the area and the seniors who will live there.

In that case the Montefiore redevelopment would be much more welcomed instead of worrying the life out of people.

Yours faithfully,

[redacted]

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

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submission

This proposal raises questions about what happens to our community when stretch roads and scale is pushed further, and offers little reassurance about how, or by whom, the consequences would be addressed.

A Snapshot of Street Reality

Most mornings on Gaza Avenue begin the same way. Cars move steadily. Someone stops, another pauses, another reverses, using what little clearance exists beside the parked cars to let another squeeze past. It is a street that relies on care and judgement,

because there is very little room to manoeuvre.

The surrounding streets are much the same. Parked cars narrow the roadway and shape how vehicles move. Over time, these streets have absorbed change — larger homes, duplexes, and households holding more people than they once did, bringing more drivers into streets that have not grown with them. This is something you experience daily, but it does not appear in statistics.

Entering or leaving Gaza Avenue often involves a moment of hesitation, followed by a sudden stop as oncoming traffic appears. There is a pause, cars shift, a look of shared understanding, and everyone moves on. Thankfully, nothing happens.
Nothing is reported.

Each of these moments seems small on its own. Together, they show how these streets really work, and how little give there is left. It is the part of daily life a traffic analysis never sees.

Changing Priorities, and Who Feels Them

My perspective on this proposal is also shaped by personal experience.

My mother has advanced dementia, and we have managed her care at home for as long as possible. Her smile still brightens my world. But I know soon, love won’t be enough.

When the time comes, our search will begin with hope of finding a place that brings her comfort, before reality shifts it to finding a place at all.

High-care beds meet that moment. They are not about lifestyle or preference. They are about need.

I am left questioning what community benefit is being delivered here, and what need it is truly responding to.

What the Drawings Can’t Show

I welcome change, and I have hoped that this proposal would bring something that sits quietly in this environment — beautifully and thoughtfully designed, adding to the place, and remaining a pleasure to live alongside over time.

Standing on the street, I struggle to picture twenty-four metres rising behind the homes. On the page it is only shapes and outlines, nothing quite real yet. I understand these are concepts and that details may change, but the height does not. The scale stays, and I find it hard to see how that would ever sit easily here.

Introducing more residents, visitors, staff and daily movement raises a simple but unanswered question: who fixes it when those

margins are gone, and what measures are actually in place to deal with that change?

Any increase in residents brings more daily life with it — friends calling in, children and grandchildren visiting — adding pressure to weekends that already feel tight.

Impact Beyond one approval

I ask that this proposal be considered not in isolation, but in terms of what it will mean for the future of Hunters Hill. Once a new scale is established, other proposals inevitably follow, shaped by what has already been permitted rather than by what the area was originally designed to support.

Note

I have also provided a separate response to the Traffic Report, including photographs that help visualise how these streets function throughout the day in ways that cannot be summarised in a report

SUBMISSION TO THE SYDNEY NORTH PLANNING PANEL

Re: Montefiore Hunters Hill Planning Proposal – Traffic and Access Assessment (Appendix F)

This submission responds specifically to the Traffic and Access Report (Appendix F) prepared in support of the Planning Proposal. The comments below focus on how the local road network operates in practice and are informed by resident observations and photographic records of existing conditions.

1. Proposed Planning Controls and Rezoning-Stage Test

The Planning Proposal seeks to enable increased development intensity through rezoning to SP2 Infrastructure (Seniors Housing) and the application of increased building height and floor space ratio controls. As these are LEP controls, they facilitate the maximum reasonable development outcome permitted under the planning framework, rather than being limited to the illustrative scheme presented.

At the rezoning stage, it is appropriate that local road infrastructure be assessed for its ability to safely and reasonably accommodate the maximum reasonable development potential enabled by the proposed controls.

Appendix F provides limited information in relation to the ability of the surrounding road network to accommodate the maximum reasonable development outcome enabled by the rezoning. In particular, the assessment relies on dated traffic data, assumptions about two-way road operation, and does not include an assessment of longer-term demand impacts.

2. Assumptions vs Current Conditions

Appendix F relies on traffic data collected in 2021 as part of a Local Area Traffic Management study. No current, site-specific traffic or parking surveys have been undertaken for Gaza Avenue, Barons Crescent, Ramleh Street, Park Road or High Street.

This approach does not fully capture:

- current traffic volumes and parking behaviour
- the interaction between kerbside parking and traffic flow
- traffic and parking conditions across the day, not just during peak hours
- additional demand from recent and ongoing residential development, including duplex housing.

Without current traffic and parking data that reflects day-to-day conditions, it is difficult to assess whether Appendix F adequately supports the proposed rezoning.

Observed reduction in road width due to kerbside parking; unclear whether this is reflected in the 2021 traffic data.

3. Assumption of Clear Two-Way Road Operation

Appendix F treats the surrounding streets as clear two-way local roads. Observed conditions suggest that this does not consistently reflect how these streets function in practice.
In many locations:

- parked cars frequently leave space for only one vehicle to pass at a time
- raised parking may impact driver visibility (vehicle size compared to parked cars)
- vehicles are often required to wait or reverse to allow opposing traffic through
- limited visibility at intersections often lead to safety concerns relating to oncoming traffic

In practice, these streets often operate as single-lane environments. Assuming full two-way operation is likely to overstate road capacity and does not reflect everyday use or safety considerations.

Without current traffic and parking data that reflects day-to-day conditions

Parked cars can restrict road width & often limit two-way vehicle movement.

4. Safety Assessment Assumptions

Appendix F states that crash and casualty statistics were analysed for the five-year period between 2016 and 2020, with only two crashes recorded in that period. However, reported crash data may not capture everyday operating conditions such as near-misses, sudden braking or evasive manoeuvres.

The assessment does not examine pedestrian and cyclist safety in detail, particularly in the context of narrow streets, kerbside parking and limited sightlines near recreational facilities with children playground and basketball courts.

The absence of reported crashes alone does not necessarily demonstrate that the local road network can safely accommodate additional traffic associated with the proposed rezoning.

Boronia Park streets experience high levels of pedestrian and cycling activity, increasing sensitivity to traffic and parking impacts.

5. Driveway Access, Sight lines & Intersections

While Appendix F suggests that driveway access provides adequate sight lines, this conclusion does not fully reflect operating conditions. Where kerbside parking is present, particularly near raised parking bays, visibility of approaching vehicles is often restricted. In these circumstances, vehicles exiting driveways may need to move partially into the roadway before achieving a clear view of oncoming traffic.

Specifically, Appendix F does not assess:

- driveway egress with kerbside parking present;
- interactions with opposing vehicles due to narrow passage of road
- manoeuvring constraints to enable oncoming traffic to pass by vehicle entry and exit at nearby intersections where sightlines may be limited.

As a result, visibility and manoeuvring when entering or exiting driveways can be constrained, particularly where vehicles are parked close to access points.

At times, visibility at driveways and nearby intersections is limited by kerbside parking and raised parking bays.

6. Parking Assumptions

Appendix F assumes that staff and visitor parking will be fully contained on site. Existing conditions demonstrate that staff and visitor parking already occurs on surrounding residential streets, further narrowing road width and increasing traffic pressures.

Appendix F has not addressed:

- overspill parking impact on surrounding streets
- short-stay parking behaviour
- parking and traffic impacts associated with resident car use, visitors and service vehicles
- impact of narrow roads and on-street parking pressures on residents.

On-street parking already constrains how surrounding residential streets function on a day-to-day basis. In an R2 Low Density Residential area with limited public transport accessibility, the assumption that parking impacts will be fully contained on site may be optimistic

and may result in an understatement of both parking and access impacts.

Appendix F focuses primarily on a "net resident increase" and does not fully reflect the day-to-day impacts associated with the full Independent Living Unit population, which could exceed 185 residents. Independent living residents are typically active and receive regular visits from friends and family, generating ongoing traffic and parking demand throughout the week, including on weekends when on-street parking pressures are already present. This is likely to place additional pressure on surrounding streets and affect existing residential amenity.

7. Existing Rat-Running Traffic

Sections of the Boronia Park road network, particularly on the eastern side of High Street between Park Road and Pittwater Road, are already known to experience rat-running by commuter traffic seeking to avoid congestion on arterial routes. This demonstrates that the local street network is already subject to displacement pressures and opportunistic rerouting behaviour.

The broader transport network surrounding Hunters Hill is already recognised by both Transport for NSW and Hunters Hill Council as experiencing congestion, safety issues and displacement traffic behaviour. Transport for NSW has undertaken consultation regarding congestion and safety at the Gladesville Road / Joubert Street intersection, and Council is progressing Local Area Traffic Management measures within the Boronia Park precinct specifically to address rat-running and safety concerns.

In addition, Council's Integrated Transport Strategy identifies traffic volume and crash pressures along key arterial routes including Victoria Road, Ryde Road, Burns Bay Road and Pittwater Road. These arterial corridors form the primary access routes to and from the Boronia Park area and directly influence driver behaviour within adjacent residential streets.

This broader context shows that the local street network is already subject to congestion and traffic displacement pressures. Appendix F does not acknowledge or assess how additional traffic generated by the proposed rezoning would interact with these existing conditions, nor how incremental increases in demand may worsen rat-running and congestion across the wider network.

8. Future Travel Demand and Car Dependency

This part of Hunters Hill is highly car dependent. The report notes that public transport services are infrequent and indirect. Cars are the main form of travel relied on by residents, visitors and staff.

Appendix F does not reflect how this car-dependent reality would shape day-to-day travel associated with the proposal. Independent Living Units are occupied by active residents who continue to drive and receive regular visits from friends and family. Staff movements also occur across multiple daily shift changes. Together, this would increase traffic and parking activity throughout the day, with the greatest change likely to be felt on weekends.

Appendix F does not adequately address:

- vehicle ownership rates among future residents;
- visitor travel patterns to include friends, children and grandchildren.
- staff vehicle trips across multiple daily shift changes; or
- service and delivery vehicle activity.

In a car-dependent location, these omissions significantly understate future traffic and parking demand.

Impact: From a local perspective, increased use of surrounding streets throughout the week is likely, adding to existing access, safety and parking constraints on narrow residential roads.

From a local perspective, rezoning could potentially permit future development that goes beyond the current concept, adding pressure to local streets that are already strained. Without clear measures or funding to address this, traffic, parking and safety pressures may increase on surrounding residential streets.

Submission Type

I am making a personal submission

Title

Ms

First Name

Heather

Family name

Armstrong

☐ Name withheld

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Email

[redacted]

Suburb/ Town

Hunters Hill

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submission

Please see the attached document.

28 January 2026

18B Barons Crescent
Hunters Hill2110

Mr Ian Woods
Department of Planning Housing and Infrastructure

Dear Mr Woods

Submission re Montefiore Seniors Living Proposal 2023-1109 ("the Proposal")

I refer to the submission to your Department regarding the Proposal by the Montefiore Redevelopment Community Action Association dated 28 January 2026.

I am a member of that Association. I support and reiterate the content of that submission.

I offer more general comments below regarding the effects that the Proposal, if accepted, would have, and regarding its insufficient basis.

The fundamental purposes of the Proposal are to increase the density of occupation of the Montefiore site, to reduce the numbers of residents needing nursing care and to substitute independent living units for adults over the age of 60. This will reduce the Proponent's outgoings and increase its cash flow.

These purposes, if achieved, will reduce the quality of life for residents of Boronia Park, with the worst impact on the immediately surrounding streets: Barons Crescent, Gaza Avenue, High Street and Park Road.

Loss of local character and amenity

Impacts on residents will include:

1. increased traffic movements in the streets mentioned above, and into the suburb beyond;

2. the associated risks of increased traffic including unacceptably high risk to pedestrians crossing those roads and congestion. Already, Boronia Park is under attack by rat runners, and High Street in peak hour exceeds the maximum safe number of traffic movements;

3. increased noise from increased traffic movements, especially from trucks supplying goods for the site such as food;

4. loss of privacy by residents of Barons Crescent who would be overlooked by four storey buildings, and residents of Gaza Avenue overlooked by two storey buildings;

5. intrusive light from high buildings spilling into the surrounding streets, houses and bushland.

Points 1 to 5 above will cause Boronia Park to lose its quiet, safe character. That would be a sad loss for those who have lived here for decades, for the fauna of the area and for those who moved here to raise their families in a quiet and attractive bushland environment.

Unacceptable increase in density

6. Modern four storey and six storey buildings of the bulk, height and scale proposed would be an unpleasant contradiction to the fabric of existing housing in Boronia Park. Situating four storey buildings close to the northern boundary of the site in order to gain maximum views of Lane Cove River will sacrifice the pleasant amenity of residents of Barons Crescent to the advantage of the inhabitants of those buildings. Six story buildings in the middle of the site

will be visible from surrounding streets. Despite the claim that “only” 61 people will be added to the number of residents, the change to more able-bodied residents will impact the surrounding suburb.

7. Necessary public and private social infrastructure has not been shown to be adequate for proposed residents since Hunters Hill Council rejected the site specific merit of the Proposal as inadequate at its Extraordinary General Meeting on 12 September 2023.

Disqualifying factors and non-compliance with planning law

8. The New South Wales government’s *Low And Medium Density Housing Policy* designates town centres where, within 800 m, increased density of housing is allowed, from a residential zone limit of two storeys up to six storeys. Boronia Park shops is one of those centres. The Proponent’s site is not within the necessary 800m distance to allow that Policy to apply. The site is not a target of the New South Wales government’s increased density targets. However, Hunters Hill Council ’s strategic planning documents designate the site as appropriate for increased density. This is an anomalous aim for a long standing low density suburb, and is opposed by residents. Contrary to Hunters Hill Council's housing strategy, this site is not appropriate for increased development density, as reflected by State government policy.

9. There are specific legislative requirements for seniors housing regarding proximity to medical, retail and community facilities in sections 93 and 94 of *State Environmental Planning Policy (Housing) NSW. S*ection 93 prevents approval of development of independent living units unless the consent authority has considered whether residents will have adequate access to facilities and services by a transport service not more than 400 m from the site, or to the facilities themselves.

10. The only public bus service within the required 400 m distance is the 538 service between Woolwich Wharf and Gladesville. The distance from the nearest bus stop on the corner of High Street and Park Road for the 252 and 536 routes (to Chatswood and Gladesville respectively) to the proposed buildings at 66-72 Barons Crescent is 1.1 km. Walking from the site’s entrance at High Street via High Street and Park Road to the corner of Park Road and Princes Street to reach the nearest bus stop for the 506 route to the city is 502.11 m. The proposed buildings are not within the distance required by section 93 of *State Environmental Planning Policy (Housing) NSW to* provide adequate access to facilities.

11. Section 94 of *State Environmental Planning Policy (Housing) NSW* is more stringent regarding residential care facilities. Development consent must not be granted for those facilities unless the consent authority is satisfied that residents of the facility will have access to facilities and services on-site, or by a transport service other than cars, taxis and the like. Many necessary facilities will not be available on site. The Proposal fails to comply with this provision.

12. Bushfire risk is a major reason why this site is not appropriate for higher density development. High Street and Barons Crescent allow vehicle access to the site, both of which are cul-de-sacs. Gaza Street, bordering the north west of the site, can only be reached from either of those two roads. Some land bordering the north east of the site is Category 2 bushfire prone land, requiring a 30 metre buffer zone for development (*The Council of the Municipality of Hunters Hill ~ Bush Fire Prone Land Map* https://www.huntershill.nsw.gov.au/files/assets/public/v/1/environment/fire-management/bush-fire-prone-land-map.pdf). The E2 conservation zone immediately opposite the south east side of the site is Category 1 land. The buffer zone from that land extends approximately 125 m into the south eastern edge of the site bordering High Street. Putting aged care residents in buildings either within or close to bushfire prone land, where encroaching bushfire would necessitate rapid evacuation, creates unacceptable risk, particularly in the case of residents in the aged care facility. Assessment by the Rural Fire Service has already ruled out the proposed furthest north east building (Building B) as safe for seniors residential housing. The existing residential aged care housing requires retrofitting for compliance with current regulations (but has been excised from the Proposal). It makes no sense to house vulnerable older people in what could become a lethal fire trap.

Lack of data for the proposal

13. The reports provided to support the Proposal repeatedly maintain that more detail will be supplied at the development application stage. They lack sufficient reliable and independent information and data to support the Proposal. That is a particularly significant omission in the case of bushfire risk.

Precedent impact

14. Change from a low density R2 residential zone to an infrastructure zone on a site without any infrastructure is a novel precedent, unsupported by planning law and regulations. Such a precedent, if utilised widely, could cause a radical change of character in low density suburbs where that change is approved.

Conclusions

It is understandable that the Proponent would like to expand its operations and increase the capacity of its assets.

However, the significant disadvantages both to surrounding existing residents in the suburb, the valuable bushland and fauna surrounding the site, as well as to future residents of the site, dictate a proposal of far less scale, bulk, height and density than this one, should any change be approved.

Adherence to planning policy and law should take priority over the Proponent's plans for expansion. Far from reflecting the local character of the neighbourhood, the Proposal flies in the face of all aspects of the character of Boronia Park and Hunters Hill.

The very limited evidence, and unsupported opinions and conclusions in the reports provided, do not support approval of the Proposal.

The Proposal should be withdrawn, resubmitted with adequate, reliable supporting evidence, then exhibited again for public comment.

Yours sincerely

Heather Armstrong

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if you do not want your name published in the list of submitters on the department's website

Email

[redacted]

Suburb/ Town

Hunters Hill

I have made a reportable political donation

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submission

I object to the height, bulk and scale of the proposed development in a low rise low density residential housing area. The maximum height of the two multi storey buildings must be contained to 4 storeys to fulfil the aim of the LEP "to maintain and enhance the character and identity of established neighbourhoods". The LEP must not be amended to allow spot rezoning which will set an unacceptable precedent within the LGA. A consideration by the Department also must be the ability for the elderly to evacuate multi storey buildings in an emergency.

Additionally, if this development is to be allowed at all, the purpose must be to maintain or increase aged care beds as the demand for

this type of care is rapidly rising. The provision of high value revenue generating units to replace these beds should not be encouraged when future community needs are unlikely to be met.

In addition, the cynical suggestion by the applicant to excise from the proposal, the section of the site that contains the aged care beds, driven by the need to meet bushfire regulations, is disgraceful. The whole of this site adjacent to bushland must fully comply with the Rural Fire Service's regulations in this time of increased fire risk.

We believe that this Proposal should not be approved in its present form particularly in this environmentally sensitive part of Hunters Hill as it will cause unacceptable impacts on narrow local roads and surrounding residents. Even more importantly, the decrease in the provision of aged care beds has serious consequences for an increasingly elderly population who are finding it more and more difficult to source the care they need.

Thank you.

Submission Type

I am making a personal submission

Title

Mr

First Name

Jim

Family name

☐ Name withheld

Please tick this box if the submitter do not want their name published in the list of submitters on the department's website

Email

[redacted]

Address 1

Address 2

Suburb/ Town

Post code

State

Does the submitter have any political donations to report?

No

Please provide your view on the application

submission

Dear Mr Woods,

I attach my submission regarding Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal, which I attempted to upload via the portal this morning. For some reason the upload facility would not upload the file that I now attach.

I presume as the Planning Proposal was on exhibition until today that submissions would be received until at least 5:00 pm this afternoon.

I make this submission on a personal basis and have not received or made any relevant political donations. I am happy for my name, Jim Sanderson, to be made available.

Please confirm that my submission has been received and will be included for consideration with other submissions.

Sincerely,

Jim Sanderson

[redacted]

Declarations

☑ **The submission will be kept in accordance to the Privacy statement**

Submission regarding Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal

By: C J (Jim) Sanderson

BE MEngSc LLB LLM

10 Nemba Street Hunters Hill 2110

[redacted]

I object to the proposal.

The reasons why I object to the proposal are set out in the submission below.

Introduction

It is accepted that the aging population in our region will create demand for additional, as well as a greater diversity of, seniors housing. Consistently with the *Hunter's Hill Local Housing Strategy*, it also makes sense to upgrade and better utilise this existing facility and avoid starting again at a new site.

However, the Montefiore Hunters Hill site is constrained by its location, being set in a low density residential area, surrounded by environmentally sensitive bushland, including Category 1 and Category 2 vegetation in bushfire prone land (BPL).[1]

Being serviced by local roads, where the traffic flows in some places exceeded the environmental maximum capacity of 300 vehicles per hour even in COVID impacted times,[2] makes clear that an objective independent analysis of the traffic impacts must be a factor in determining the scale of any development in the Boronia Park precinct.

Community angst about the loss of aged care beds to make way for 'luxurious'[3] independent living units (ILUs) is understandable, not just because of the expanding over 85 year old

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1 Blackash Bushfire Consulting, *Strategic Bushfire Study Sir Moses Montefiore Jewish Home 116-120 High street, 2-20 Gaza Avenue and 45-47 Barons Crescent, Hunters Hill* (30 September 2025), 8-11.

2 ptc., *Boronia Park Precinct Draft Local Area Traffic Management Plan* (15 June 2021) <https://ehq-production-australia.s3.ap-southeast-2.amazonaws.com/087a012b129707cc0c32eae74dcdbda4304bb5a5/original/1715583984/a4d0ceef480ab2931b27d228b5504a27_ptc.-Boronia-Park-Precinct-Draft-LATMS-June2021.pdf?X-Amz-Algorithm=AWS4-HMAC-SHA256&X-Amz-Credential=AKIA4KKNQAKIII4DU7AG%2F20260113%2Fap-southeast-2%2Fs3%2Faws4_request&X-Amz-Date=20260113T025558Z&X-Amz-Expires=300&X-Amz-SignedHeaders=host&X-Amz-Signature=7d306c770f1a1ccfda28c1b0d3d68c3ea1ba5ca6c2ec42d18dbf9accb2d2e416> 11, 13 [3.2].

3 See, eg, Equity Development Management, *Montefiore Seniors Living Development Randwick, NSW*, (accessed 24 January 2026) <https://equitydm.com.au/montefiore-seniors-living-development-randwick-nsw/>.

population but also because of the of greater demand younger more mobile seniors and those who cohabit with them will place on local resources and particularly local roads.

Local amenity must be protected by ensuring development of the site is consistent with the aims of the *Hunters Hill Local Environmental Plan 2012* (LEP), in particular 'to maintain and enhance the character and identity of established neighbourhoods'.

These aims are entirely consistent with the other very relevant planning instrument that applies to this site, the *State Environmental Planning Policy (Housing) 2021* (Housing SEPP) and in particular Chapter 3, Part 5.

In relation to the 'Design of seniors housing', s 97 of the Housing SEPP requires that the consent authority must 'consider the *Seniors Housing Design Guide*' and must not grant consent 'to development for the purposes of seniors housing unless the consent authority is satisfied the design of the seniors housing demonstrates that adequate consideration has been given to the design principles for seniors housing set out in Schedule 8.'

Although, s 97 relates to development consent, it is essential that many of the provisions of the Housing SEPP should be carefully considered at the Planning Proposal stage, including provisions relating to water and sewer, bush fire prone land, design of seniors housing and some non-discretionary development standards, particularly in relation to traffic and parking.

This Planning Proposal proposes what the Housing SEPP and the associated *Seniors Housing Design Guide*, would consider to be high density development in a low density residential area. This is not acceptable. The 'Design principles for seniors housing' provided in Schedule 8 of the Housing SEPP, particularly relating to 'Neighbourhood amenity and streetscape', should be applied to allow an amended LEP to deliver an acceptable medium density solution.

The Planning Proposal must also consider the blend between residential aged care and seniors' independent living in the light of an up to date community needs analysis. It is noted that the Planning Proposal's Appendix G 'Social Impact Report' does not report on 'Social Impact' but contains a 'Community Needs Assessment' (CNA), last revised in May 2023, before the many amendments to this Planning Proposal. The CNA must also follow and take account of the Housing SEPP's definition of seniors to include 'people who are at least 60 years of age'.[4] This would result in ILUs normally having at least one resident of at least 60 years of age (rather than the earlier proposed 55 years), which would have a number of benefits, including reducing demand for the now lower number of ILUs and a likely reduction in traffic movements with slightly older residents less likely to travel to work.

At its meeting on 22 June 2023, the Hunter's Hill Local Planning Panel (LPP), in an advisory capacity, among other things resolved unanimously that: 'A conservation plan to assess the whole site including the garden and synagogue be prepared by an independent heritage

[4] *State Environmental Planning Policy (Housing) 2021*, s 82.

expert …'. This is essential to guide the treatment and management of impacts on items of heritage significance throughout this project.

From the brief discussion above, it is clear that documentation supporting the Planning Proposal is lacking in terms of items being missing, out of date or in need of replacement.

Following an update of this documentation, rigorous analysis is required to determine a suitable medium scale including showing how facilities will be distributed, as well as identifying where the LEP is genuinely in need amendment, to deliver the right blend of residential aged care and ILUs in a development that is appropriate for its location.

This was always going to be a complex proposal.

On 23 April 2024, the Director at the Department of Planning, Housing and Infrastructure determined that an amendment to the *Hunters Hill Local Environmental Plan 2012* to rezone the site from R2 Low Density Residential to SP2 Infrastructure (Seniors Housing) and increase the maximum building height and the floor space ratio, should proceed subject to conditions including relating to bushfire protection and Integrating Land Use and Transport.

This Gateway Determination also belatedly found that 'the planning proposal is categorised as **complex** as described in the *Local Environmental Plan Making Guideline*'.[5] (Emphasis added). Hunter's Hill Council should have been given 115 days rather than the 90 days it had to review and assess the Planning Proposal. The additional 25 days could have been productively utilised to better address some of the shortcomings of the proposal that will be discussed.

Discussion

There is concerned that the processes undertaken to progress the Planning Proposal this far have been shambolic and have not adequately responded to recommendations made by Hunter's Hill Council (Council), Council's Local Planning Panel (LPP) and the Hunters Hill community. Community consultation has largely been confined to newsletters firstly only distributed a section of the Boronia Park precinct in close proximity the subject site and a community information session run by Urbis that only 37 people attended.[6]

Further reasons for my objection to Planning Proposal PP-2023-1109 Montefiore Seniors Living Proposal are set out below:

Bushfire Protection

Bushfire Protection is not considered holistically by the Blackash *Strategic Bushfire Study*, appearing in Appendix N of the proposal.

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5 Department of Planning, Housing and Infrastructure, *Gateway Determination Planning proposal (Department Ref: PP-2023-1109)* (23 April 2024) Condition 4(d).

6 Urbis, *Montefiore Hunters Hill Planning Proposal: Community and stakeholder engagement outcomes report* (3 February 2023) 7 [3.3].

The two south eastern lots, accommodating all of the 194 residential aged care beds to be retained in existing buildings 'exposed to a higher bushfire risk',[7] have been excised from the Planning Proposal and are not given the same attention as other parts of the site.

It cannot be accepted that the excision the south eastern lots of the site from the Planning Proposal satisfies Condition 1(a) of the Gateway Determination in demonstrating the ability to achieve compliance with the relevant performance criteria in Section 6.4 of 'Planning for Bushfire Protection 2019'. Section 6.4 applies 'In circumstances where new building projects within existing SFPP [Special fire protection purpose] developments are proposed',[8] whether or not there is a Planning Proposal. Section 6.4 must be applied across the entire site.

An objective of Section 6.4 applying to existing SFPP development is to 'provide a better bush fire protection outcome for existing buildings'.[9] However, in regard to existing buildings housing RACF beds close to the southern boundary, the Blackash *Strategic Bushfire Study* places reliance on continued risk mitigation on the subject site and collaboration with authorities to reduce risk with further reliance placed on the *Hunters Hill Lane Cove Parramatta Ryde Bushfire Risk Management Committee Bushfire Risk Management Plan 2019 – 2024* designating an asset protection zone [APZ] along the southern interface of the site.[10]

Section 3.2.5 of 'Planning for Bushfire Protection 2019' provides:

> In order to guarantee that an APZ can be managed in perpetuity, APZs should be contained within the overall development site and not on adjoining lands.

It would appear the risk of bushfire to the proposed Building B from Category 2 vegetation on the other side of Barons Crescent has caused the use of this building to change from ILUs to a mix of ancillary uses. While the bushfire risk to buildings near the southern boundary of the site, from more hazardous Category 1 vegetation in much closer proximity, has not brought about a review of the use of these buildings for RACF accommodation.

This anomaly lacks reason. While the occupation of Building B by ILU residents is prevented on what appear to be sound grounds, the more at-risk less physically able RACF residents, who will be more difficult to relocate, can be accommodated in existing buildings 'exposed to a higher bushfire risk'.[11]

An updated Strategic Bushfire Study must indicate appropriate safe locations on the site for Residential Aged Care Facility (RACF) beds and for Independent Living Units (ILUs) to provide

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7 Blackash Bushfire Consulting, above n 1, 19.

8 NSW Rural Fire Service, *Planning for Bush Fire Protection: A guide for councils, planners, fire authorities and developers*, (November 2019) <https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0005/174272/Planning-for-Bush-Fire-Protection-2019.pdf> 52 [6.4].

9 Ibid.

10 Blackash Bushfire Consulting, above n 1, 19.

11 Ibid.

certainty about the site layout in a finalised Masterplan before approval of the Planning Proposal can be considered.

Rezoning Part of Site to SP2 Infrastructure (Seniors Housing)

Rezoning Part of the Site to SP2 Infrastructure (Seniors Housing) provides some certainty about future uses.

However, amending the LEP Land Use Table by adding 'community facility' and 'restaurant and café' to the uses permitted with consent for land zoned SP2 Infrastructure is completely unacceptable – this would permit these additional uses of all land in the Municipality of Hunter's Hill that is zoned SP2 Infrastructure, which would lead to unintended and unacceptable consequences.

Proponent led Planning Proposals must not be allowed to amend LEP Land Use Tables – this is a function for Councils with the support of their communities.

Even if the additional uses of 'community facility' and 'restaurant and café' can be confined to SP2 zoned land within the subject site, many community facilities and certainly restaurants would not be appropriate development in cul-de-sacs like Barons Crescent or indeed in most low density residential areas.

If greater certainty is required about the permissibility of low impact development, on SP2 Zoned areas of the site, then this should be addressed by adding very specific additional permitted uses to Schedule 1 of the LEP or alternatively, although not as legally binding, being dealt with in the *Site Specific DCP* but to provide certainty, the *Site Specific DCP* must be a finished document, not the present indicative document, before this Planning Proposal is considered for approval.

Building B

The proposed Building B remains a four storey building which appears to be extremely large if it is no longer to include ILUs but is instead used for development that is in fact 'ordinarily incidental or ancillary' to seniors housing, even if it includes staff housing. This and the unacceptable impact of four storey development immediately opposite one and two storey residential housing set in bushland, leads to the conclusion that the proposed Building B should be of a smaller scale, I would suggest two storey with a maximum height of 8.5 metres.

Building Heights

The principle that there should be gradual transitions in building heights and not abrupt changes, as will occur if four storey development is permitted adjacent to the perimeter of the site, is provided for in the Housing SEPP Schedule 8 'Design principles for seniors housing' 1 (d) (iii) of 'adopting building heights at the street frontage that are compatible in scale with adjacent buildings'.

The proposed building heights in the Planning Proposal are generally too high. While the maximum building height of 8.5 metres in Gaza Avenue is acceptable, sound reasons are given above to limit the height of the proposed Building B to 8.5 metres.

The four storey Building A, with a proposed maximum building height of 16 metres, is proposed to replace existing development, including two small cottages in Barons Crescent near the corner of Gaza Avenue. This will have a devastating impact on the streetscape and character of the area – refer to Figure 1 below.

Figure 1: Single storey cottages in Barons Crescent near the corner of Gaza Avenue. The replacement of these cottage with a four story building, even with greater setbacks and articulation, will have a devastating impact on the streetscape and character of the area.

All buildings near the perimeter of the site should have a maximum building height of 8.5 metres.

The 24 metre building height for the proposed six storey Buildings C and D in the middle of the site are at odds with the objectives of the *Seniors Housing Design Guide* for Independent living for medium density, in regard to neighbourhood amenity and streetscape, which has the objectives:

To provide two or three storey housing clusters where the scale and massing is articulated and separated to respect the character and pattern of the suburban surroundings.

To positively enhance the streetscape and uplift the quality of built form in the neighbourhood, and provide a landscape buffer to soften the development.[12]

The proposed Buildings C and D, being at some distance from the perimeter of the site, could be four storey buildings with a maximum height of 16 metres.

Whatever heights are decided on for amendment of the LEP, they must not provide significant margins for to allow concept designs to expand to fill unutilised parts of the available building envelope when development application(s) are lodged.

Floor Space Ratios

Following determination of maximum building heights to be used in a revised LEP, site Floor Space Ratios (FSRs) need to tested and tightened up to prevent the risks of bulkier and heavier massing than is suggested in the *Site Specific Development Control Plan* and its Masterplan, which must be finalised rather than being 'indicative' before considering approval of this Planning Proposal.

Traffic Management

I oppose the proposal for additional vehicular access to the underground parking and loading docks from Barons Crescent. This proposal will introduce additional traffic movements, including heavy delivery and service vehicle arrivals and departures, into a quiet residential cul-de-sac. The turning bay, proposed to allow forward-in and forward-out movements for all service and delivery vehicles accessing the site, must be located underground and should only be accessed from existing driveways off High Street.

The *Traffic Impact Assessment* (TIA) prepared by Urbis uses out of date vehicle counts taken for the ptc. *Boronia Park Precinct Draft Local Area Traffic Management Plan*, of 15 June 2021, a time when traffic flows were still impacted by COVID.

The TIA does not consider the impact of recent and upcoming changes that will further increase vehicle flows.

The TIA selectively uses this out of date data by excluding consideration of the western end of High Street, a likely route to and from the subject site for those travelling to or from the north or west – even during COVID impacted times, outbound morning peak hour traffic volumes in this part of High Street exceeded the environmental maximum capacity for local

[12] NSW Planning & Environment, *Seniors Housing Design Guide*, (November 2023) <https://www.planning.nsw.gov.au/sites/default/files/2023-07/seniors-housing-design-guide.pdf> 101 [15.1.1]-[15.1.2].

roads of 300 vehicles per hour.[13] There are other anomalies relating to how on-site parking requirements are assessed.

A reputable, properly qualified and independent traffic engineer must be appointed to prepare a new Transport Impact Assessment, starting with new traffic counts that truly reflect current traffic movements.

Independence of Supporting Material

In addition to preparing the Planning Proposal, Urbis prepared seven of the 14 Appendices that support the Planning Proposal.

Only two of the Appendices provide details of the qualifications the authors that equip them with the expertise to prepare such material.

As noted above and I am sure will be noted other submissions, a number of the documents are dated having been prepared before significant changes were made to the Planning Proposal so that the impacts of these changes are ignored.

As evinced above, the selective bias in the analysis of out of date data in the Urbis *Transport Impact Assessment*, renders this document worthless and brings into question the credibility of Urbis as an organisation capable of preparing a Planning Proposal worthy of consideration.

Before this Planning Proposal progresses any further, it is essential that there be a thorough review of all supporting documentation.

It is strongly recommend that a number of the supporting documents be replaced by up to date reports prepared by appropriately qualified independent experts, detailing their qualifications and experience in preparing such material.

Composition of Sydney North Planning Panel

Two of Hunter's Hill Council's Sydney North Planning Panel (SNPP) representatives were excluded from the Sydney North Planning Panel that met on 18 December 2023, resulting in the Panel of three all being State appointees. Future meeting of the SNPP that deal with this Planning Proposal must include a local panel member with a sound understanding of the character and identity of established neighbourhoods in Hunters Hill.

Conclusion

Fair assessment of this complex Planning Proposal demands that supporting material be up to date and reliable.

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[13] NSW Roads and Traffic Authority, *Guide to Traffic Generating Developments*, (October 2002) <https://www.transport.nsw.gov.au/system/files/media/documents/2022/guide-to-generating-traffic-developments.pdf> 4-9 Table 4.6.

There are numerous deficiencies in the supporting material so it is essential that before this matter progresses further that the proponent appoints independent appropriately qualified experts to update or, in some cases, replace material that this Planning Proposal relies on.

Numerous unacceptable impacts have been identified, including relating to: bushfire risks; traffic congestion; zoning permitting inappropriate uses; and the impact of four and six storey development on the streetscape and character of the area.

The level of these impacts indicates that development that will be permitted should this Planning Proposal be approved is simply too large in scale.

Development of the Montefiore Hunters Hill site for expanded seniors housing can only be medium density in scale and must be consistently with the aims of the *Hunters Hill Local Environmental Plan 2012*, and in particular 'to maintain and enhance the character and identity of established neighbourhoods'.

Submission Type

I am submitting on behalf of my organisation

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if the submitter do not want their name published in the list of submitters on the department's website

Email

[redacted]

Address 1

Address 2

Suburb/ Town

Post code

State

Does the submitter have any political donations to report?

No

Please provide your view on the application

submission

Dear Sir,

This submission has been prepared on behalf of the residents of No 9 Gaza Avenue, Hunters Hill. The submission was to be lodged on the planning proposal portal today as the exhibition finishes today. However, by 4.30pm, the planning proposal was transferred from “on exhibition” to “Post-Exhibition” and so the submission is made directly to contacts stated for the planning proposal.

This submission requests that properties along Gaza Avenue (including 45 Barons Cres, 116 to 118 High Street and 2 to 20 Gaza Avenue – referred to here as the Gaza Avenue Lots) remain in the current R2 Low Density Residential zone.

The objective and intended outcome of this proposed change is zoning from R2 to SP2 Infrastructure is stated in the planning proposal as being:

Rezone part of the land from R2 low density residential zone to SP2 Infrastructure (Seniors Housing) to clarify the delivery of additional seniors housing accommodation across the whole site in a manner that provides certainty for Montefiore and the local Community.

and

Rezone part of the land from R2 low density residential zone to SP2 Infrastructure (Seniors Housing) to facilitate the delivery of additional seniors housing

The rezoning of the Gaza Avenue Lots from R2 to SP2 is not necessary to achieve these outcomes. Seniors housing is permissible with consent under S81 of State Environmental Planning Policy (Housing) 2021 and, according to the planning proposal, because of paragraph 6 of Schedule 1 of Hunters Hill Local Environmental Plan 2012. No further clarity is required and a change in zoning is not required to provide certainty for Montefiore or the local community. The provision of seniors housing is specifically catered for and promoted in the Part 5 of Chapter 3 of State Environmental Planning Policy (Housing) 2021 and not greater certainty is required.

The objectives of the SP2 Infrastructure Zone sought by the applicant are:

? To provide for infrastructure and related uses.

? To prevent development that is not compatible with or that may detract from the provision of infrastructure.

? To facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land.

The objectives for development in the current R2 Low Density Residential Zone are:

? To provide for the housing needs of the community within a low density residential environment.

? To enable other land uses that provide facilities or services to meet the day to day needs of residents.

? To maintain the identity of Hunters Hill by ensuring that new buildings are compatible with the garden suburb character and heritage values that distinguish the low density localities.

? To provide for high levels of amenity that are consistent with a low density residential environment

These objectives of the R2 zone reflect the stated intent of the planning proposal as it relates to the Gaza Avenue Lots with a 2 storey 8.5m height limit and the proposed built form and access arrangements. Furthermore, Gaza Avenue has a road reserve width of 12 metres compared to 20 metres to Barons Cres and High Street and is the closest part of the site to adjoining low density residential development. It is important that the assessment of any subsequent development application should have regard to the objectives of the R2 zone and the only way this can happen is if the Gaza Avenue Lots remain in an R2 zone with the above objectives required to be considered under Clause 2.3(2) of Hunters Hill Local Environmental Plan 2012.

This will ensure that, at the development application stage, the proposed two storey ILUs fronting Gaza Avenue are design in a manner that reflects the character of the street and the properties on the western side of Gaza Avenue with greater building separation or articulation to reduce bulk and scale.

In this regard Council is requested to include further controls in Section 2.5 of the draft DCP submitted with the planning proposal to ensure that the design of the buildings fronting Gaza Avenue are designed and articulated to reflect the detached dwelling character of existing Gaza Avenue.

Feel free to call and discuss.

[redacted] Director

[redacted]
Level 2, 22-36 Mountain Street, BROADWAY NSW 2007
PO Box 438, BROADWAY NSW 2007
bbcplanners.com.au
[redacted]

Declarations

☑ **The submission will be kept in accordance to the Privacy statement**

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if the submitter do not want their name published in the list of submitters on the department's website

Email

[redacted]

Address 1

Address 2

Suburb/ Town

Post code

State

Does the submitter have any political donations to report?

No

Please provide your view on the application

submission

Hi Ian,

Thank you for allowing me to put forward my submission regarding the proposal.

My objection to the proposal in my opinion is the overdevelopment and the building is inconsistent and disproportionate with the neighbourhood which is largely single family homes. In particular traffic from regular visitors, staff and supplies would be significantly increased (probably by several multiples) of what is currently in existence. This traffic is also likely to extend to heavy vehicles such as trucks which will be required to deliver goods at scale to this extensive residential development (for example food, linen, cleaning and other supplies).

The limited street parking around the passive Boronia Park (corner High Street and Park Road, extending to Princes Street) is already busy and sometimes strained, including by those which appear to be working at the existing Montefiore site. Excluding the extra pressures from current residential construction this is always busy and would be further strained by this significant increase in development and people seeking short term parking such as those utilising the park for passive recreation, walking their dogs and visiting local residences would be negatively impacted. Also noteworthy is that the passive area of Boronia Park is a destination location enjoyed by local communities beyond Hunters Hill and Boronia Park.

In summary it is too big a development and we ask that any increase in the number of residents and the building be either zero or a small fraction of what is sort. It is my view that to grant the DA is at great risk to irreversible negative impacts. Developments of this scale should be not allowed or at most gradual in line with historical creep with communities so that each step can be assessed and monitored.

Regards,
[redacted]

Declarations

☑ **The submission will be kept in accordance to the Privacy statement**

Submission Type

I am making a personal submission

Title

[redacted]

First Name

[redacted]

Family name

[redacted]

☑ Name withheld

Please tick this box if the submitter do not want their name published in the list of submitters on the department's website

Email

[redacted]

Address 1

Address 2

Suburb/ Town

Post code

State

Does the submitter have any political donations to report?

Yes

Please provide your view on the application

submission

Dear Mr Woods,

I am writing to lodge a formal objection to the Montefiore Seniors Living Planning Proposal (PP-2023-1109) currently on public exhibition. My concerns relate to the significant and permanent impacts the proposal would have on the surrounding neighbourhood, local amenity, traffic conditions, and the planning integrity of the Hunters Hill Local Government Area.

Having reviewed the documentation published on the NSW Planning Portal and referenced on Hunters Hill Council's website, I outline my objections below.

1. Excessive Height, Bulk and Density

The proposal seeks to rezone the site from R2 Low Density Residential to SP2 (Seniors Housing) and allow building heights up to 24 m, with a proposed uniform FSR of 1:1. This represents a dramatic departure from the surrounding low-rise residential character and would result in unacceptable visual bulk and overshadowing impacts.

2. Inadequate Community Consultation

The consultation radius was too narrow and excluded many residents who will be materially affected by increased density, traffic and changes to the neighbourhood character. This concern is heightened by the fact that consultation is being run by the Planning Panel, not Hunters Hill Council, due to the rezoning review outcome.

3. Increased Traffic Movements and Road Congestion

Higher density, increased staff numbers, visitors, service providers and deliveries will substantially worsen traffic. Surrounding streets are already constrained, and the exhibited proposal acknowledges new basement parking with access points on High Street and Barons Crescent, further intensifying local congestion.

4. Insufficient On-site Parking

The proposal does not provide clearly adequate staff or visitor parking for such a large, high-intensity use. Overflow parking will inevitably spill into neighbouring streets, exacerbating an already significant parking shortage and reducing residential amenity.

5. Precedent for Large-scale Redevelopment of Other Aged-Care Sites

Rezoning the site to permit 6-storey-equivalent development sets an irreversible precedent for similar intensification at multiple other aged-care and seniors facilities within the LGA, a risk highlighted in community and heritage-based assessments.

6. Reduction in Residential Aged-Care Capacity

Documentation shows the proposal would reduce high-care residential aged-care beds from 333 to 207, while adding 144 independent living units. This reduces capacity for high-needs seniors despite demographic forecasts showing increasing aged-care demand.

7. Bushfire Safety Concerns Not Resolved at Rezoning Stage

The NSW Rural Fire Service has confirmed that the proposal must demonstrate compliance with Planning for Bush Fire Protection 2019, including mandatory setbacks and defendable space for Special Fire Protection Purpose developments. This has not yet been shown and cannot be deferred until Development Application stage.

8. Environmental, Tree and Biodiversity Impacts

The scale of development, increased hard surfaces, and building massing place tree canopy, wildlife corridors and the nearby Boronia Park environment at risk. Independent controls for canopy retention, deep soil and wildlife-sensitive lighting are missing from the exhibited planning controls.

9. Stormwater, Drainage and Overland Flow Risks

A substantial increase in building footprint and impervious area will intensify stormwater flows. Without robust, binding water-sensitive design targets embedded in the LEP/DCP, downstream flooding impacts remain unresolved.

10. Precedent for Large Scale Seniors Housing Developments

Approval of this proposal would establish a significant precedent for the redevelopment of other aged-care and seniors sites across Hunters Hill. Community organisations have previously identified at least seven similar sites—including those along Woolwich Road, Ferdinand Street, Passy Avenue and Hunters Hill Village—that could seek comparable height increases and intensification if this rezoning proceeds. Because the proposal shifts planning controls from low-density residential zoning (8.5 m height) to an SP2 framework allowing buildings up to 24–26 m, it risks creating a cascading effect that would permanently alter the low-rise character of the broader municipality.

Requested Outcome

Given the significant unresolved issues, I request that the Planning Proposal not proceed in its current form.

Should the proposal nevertheless be considered further, I urge that strict, enforceable, site-specific controls be applied—particularly those relating to height transitions, maximum traffic generation, parking provision, bushfire compliance, canopy protection, stormwater management, acoustic criteria, and minimisation of environmental impacts.

Thank you for considering this submission. I would appreciate confirmation of receipt and updates on any further stages of assessment.

Kind regards,

[redacted]

Mob: [redacted]

E: [redacted]

Declarations

☑ **The submission will be kept in accordance to the Privacy statement**