

Summary of Submissions

PP-2023-1109



Submitter	Issues Raised	Proponent Response	PPA Team Response
Hunters Hill Council			
Hunters Hill Council advised they did not wish to make a submission			
Agency Submissions			
NSW Rural Fire Service	The NSW Rural Fire Service (RFS) identifies the proposal as infill Special Fire Protection Purpose (SFPP) development and notes earlier correspondence (31 May 2024) in which the development was “not supported” due to insufficient bushfire protection, including the need for a 60 m SFPP Asset Protection Zone (APZ) from the hazard to the north-east. This 60 m APZ is partially reflected in the site layout plan of the Blackash Strategic Bushfire Study but not reflected in proposed land zoning map of the Planning Proposal. The RFS highlights this inconsistency and expects the rezoning mapping to align with the agreed APZs. The RFS advises it will support a rezoning outline for <i>SP2 Infrastructure (Seniors Housing)</i> only if the APZs for SFPP identified in Table 3 of the Strategic Bushfire Study are used to define the area of the proposed rezoning. In practical terms, the <i>SP2 Infrastructure (Seniors</i>	In response to the NSW RFS submission, the proposed <i>SP2 Infrastructure (Seniors Housing)</i> zone area was reduced so that the rezoning reflects the required APZ outcome, as requested by RFS. The remaining proposed <i>SP2 Infrastructure (Seniors Housing)</i> zoned area meets the 60m SFPP APZ setback required by the NSW RFS, particularly as they relate to Buildings A, C and D.	The PPA team notes that RFS concerns related to inadequate APZ's were in relation to the APZ's for Building B, which is shown as a non SFPP use within the concept plan ,but proposed to be zoned <i>SP2 Infrastructure (Seniors Housing)</i>, a SFPP use. In response to the RFS submission, the proponent is proposing to retain the current <i>R2 Low Density Residential</i> zoning in this area, which would allow the Building B to rely on reduced setbacks, when compared to those of a SFPP use. As outlined in RFS's submissions, they would support this approach given the setbacks reflect the proposed <i>R2 Low Density Residential</i> zoning. With this change, the PPA team are of the opinion that the proposal has adequately demonstrated that suitable APZ's consistent with the requirements of Planning for Bushfire Protection (PBP) 2019 can be achieved on site.

Summary of Submissions

PP-2023-1109



Submitter	Issues Raised	Proponent Response	PPA Team Response
	<i>Housing</i>) boundary must follow the SFPP APZ footprint, and any departure from that APZ configuration would not be supported.		Given a planning proposal does not approve APZ's, the PPA team are satisfied that, provided the post exhibition change is supported by the Panel, the proponent has adequately addressed the matters raised by RFS and the matters do not prevent the progression of the proposal to finalisation.
Sydney Water Corporation	Sydney Water's preliminary assessment indicates that water and wastewater servicing should be available for the proposed development. A critical wastewater main forming part of the Northern Suburbs Ocean Outflow Sewer traverses the site. Due to the critical nature of this asset, the proponent is required to engage a Water Servicing Coordinator prior to the Development Application (DA) stage to ensure future construction plans do not impact this main.	Noted.	The PPA team notes the submission provided by Sydney Water, noting they have raised no concern regarding the progression of the proposal. The PPA Team is satisfied that Sydney Water's servicing and stormwater-related issues can be managed through the DA stage and do not require further changes to the planning proposal prior to finalisation.
Jemena	Jemena confirms that, following a preliminary review of the Planning Proposal and supporting documentation, it has no objection to the proposal.	Noted.	Jemena has reviewed the planning proposal and raised no objection. The PPA Team considers that Jemena's advice does not pose a barrier and does not prevent the planning proposal from proceeding to finalisation.

Summary of Submissions

PP-2023-1109



Submitter	Issues Raised	Proponent Response	PPA Team Response
Ausgrid	Ausgrid raises no objection at the Planning Proposal stage and requests future DAs demonstrate compatibility with Ausgrid's electricity infrastructure and that standard Ausgrid conditions be applied where triggered.	Noted.	The PPA Team is satisfied that matters raised by Ausgrid's can be managed through future development consents and do not prevent the planning proposal from being finalised.
Transport for NSW	Transport for NSW (TfNSW) notes that the site is bounded by local roads and has good access to the surrounding local and arterial road network. No state-road capacity or access issues are identified at the planning proposal stage. TfNSW notes that the Strategic Bushfire Strategy indicates the site benefits from "unconstrained firefighter access", with established road networks providing multiple direct and efficient routes and entry points for emergency response vehicles. No further transport-related bushfire concerns are raised at this stage.	Noted.	The PPA Team note that TfNSW have raised no issues with the planning proposal, the road networks capacity, the traffic impact statements data or site access at this stage. Any local road or intersection works and site access details can be further investigated and addressed through updated traffic assessments and conditions at a future DA stage. Given the above, the PPA Team are of the opinion that TfNSW has raised no issues that prevent the proposal from proceeding to finalisation.

Summary of Submissions

PP-2023-1109



Community Issue	Summary of Issues	Proponent Response	PPA Team Response
Built Form & Development Intensity <i>63 of 69 submissions (91%)</i> <i>Includes building height, scale and bulk, overdevelopment, density, FSR uplift, built form, massing, setbacks and landscape buffers.</i>	Height, Scale, and Bulk Submissions noted that the proposed 4–6 storeys (approx. 16–24 m) is a significant change from the existing heights and prevailing one and two-storey surrounding area. Residents emphasise that the height would make the proposal visually prominent across sensitive street interfaces (e.g. Gaza Avenue and Barons Crescent). Community groups, including the Hunters Hill Trust and the Montefiore Redevelopment Community Action Association Inc. (MRCAA), stress that development should be medium-density in scale and consistent with the <i>Seniors Housing Design Guide's</i> intent for predominantly two and three-storey building clusters. Density, FSR and Perceived Overdevelopment Residents are concerned that increasing FSR from 0.5:1 to 1:1 and significantly expanding the number of independent living units would “double” development intensity, leading to what many describe as overdevelopment. They see the	The site is identified in Council's Local Housing Strategy as a strategic site for additional seniors housing density. Height, bulk and scale are managed through statutory LEP controls and a site-specific DCP. Higher buildings are concentrated towards the centre of the site, with lower height controls retained along Gaza Avenue and High Street, and building heights stepping down towards the site boundaries to provide a transition to neighbouring low-rise dwellings. The existing maximum height of 8.5m is retained along Gaza Avenue and High Street, adjoining low-density housing, the heritage garden and the existing residential care facility to provide a better interface to the surrounding low density residential areas. The controls provide certainty about future scale through numeric height limits, storey controls and roof-top plant controls. The existing FSR of 1:1 is retained across most of the site, with the uplift in FSR applying	The PPA Team acknowledges the concerns about the proposed heights, overall massing, FSR and perceived overdevelopment relative to the surrounding <i>R2 Low Density Residential</i> context. The Sydney North Planning Panel (Panel) and the Department separately determined that the Planning Proposal, as it relates to height and floor space ratio controls, demonstrated sufficient strategic and site-specific merit to be supported. The PPA team notes that although Council's adopted Local Housing Strategy does not recommend specifically built form controls for the site, it does acknowledge that the site has with potential to undergo master planning and redevelopment, which in turn could lead to uplift. The Low and Mid-Rise Housing Policy is part of the State Environmental Planning Policy (SEPP) (Housing) 2021 and encourages the delivery of low and mid-rise housing within 800 metres of nominated town centres and transport hubs. Boronia Park Town Centre is a

	proposed FSR as characteristic of higher-density mixed-use or urban centres rather than an <i>R2 Low Density Residential</i> area. Community submissions also note that the concept scheme only requires an FSR of around 0.8:1, so a 1:1 control could lead to even bulkier outcomes at DA stage than those shown indicatively Relationship to Surrounding Dwellings and Character Submissions emphasise that the bulk and massing of the proposed buildings would visually dominate neighbouring properties and erode the current sense of openness. Residents are concerned that long, tall building forms facing Gaza Avenue and Barons Crescent will create an institutional-scale campus rather than a development that sits quietly in a low-density residential setting valued by older people. Community groups point to the contrast between proposed four to six storey buildings and the existing single-storey cottage on the Gaza/Barons corner, arguing that this illustrates how out of scale the proposal is with established streetscapes. Landscape Buffers and Setbacks Several submissions highlight uncertainty	only to the western strip fronting Gaza Avenue, where future buildings would still be subject to the lower 8.5 m height limit. Built form moderation is also achieved through setbacks, building separation, upper-level setbacks, deep-soil landscaping and retained and additional canopy planting. Taller buildings are kept away from site edges, and continuous built-edge or institutional outcomes are avoided through building spacing, varied forms and architectural expression. Built form, setback and visual impact controls are clearly defined in the Planning Proposal, draft DCP and Masterplan, ensuring future development respects neighbourhood character and limits street-level visual dominance. Notwithstanding, further detailed design and technical assessment and mitigation measures can be undertaken at DA stage to further reduce all of these potential amenity impact issues.	nominated location under the Policy, allowing mid-rise housing up to six storeys on land around the town centre. Whilst the subject site does not fall within this radius, areas to the west of the site are included within this area. This uplift is likely to result in changes to the low-rise residential character surrounding the site, irrespective of the outcomes of this Planning Proposal. Increases in building height enabled by the Policy in the locality surrounding the site would progressively improve the transition in built form between Boronia Park Town Centre and the subject site. The building form will be further refined to address bulk, overshadowing and visual impact concerns during the DA stage. Further fine grain detail controls addressing these matters can also be addressed through Council's site specific DCP for the site. Whilst the PPA team understands Council is seeking to prepare a site-specific DCP for the site. To ensure these controls are implemented, it is recommended a local clause be included in the Planning Proposal to require a site-specific DCP be in place prior to the first DA being
--	--	--	--

Summary of Submissions

PP-2023-1109



	about setbacks and vegetation buffers, particularly along Barons Crescent and Gaza Avenue. Residents want greater setbacks and substantial tree planting to soften building bulk, protect privacy and maintain a green, garden-suburb edge, consistent with the <i>Seniors Housing Design Guide</i> 's emphasis on landscape buffers.		approved. The PPA team are satisfied that the concerns raised by the community regarding built form have been addressed and do not prevent the progression of the planning proposal.
Transport, Traffic & Access Impacts <i>61 of 69 submissions (88%)</i> <i>Includes increased traffic, inadequate road infrastructure, congestion, increased service vehicle flow, traffic noise, wider traffic impacts, rat-running, reliance on private vehicles, limited public transport and insufficient integrated land-use/transport planning.</i>	Existing and Future Congestion Residents stated nearby streets and intersections already experience congestion, queues and delays, particularly at peak times. They are concerned that trips by residents, staff, visitors, service vehicles and construction traffic will significantly worsen congestion on local streets not designed for such volumes. Community groups note that peak-hour volumes on sections of High Street already exceed environmental capacity standards for local roads even under COVID-era conditions Service and Delivery Vehicles Residents are particularly concerned about increased service and delivery vehicle movements (waste collection, food, medical supplies, linen, maintenance, etc.). They expect frequent	A detailed Transport Impact Assessment accompanied the Planning Proposal and concludes that surrounding local streets will continue to operate within TfNSW environmental capacity limits. No surrounding road is expected to exceed capacity during either network peak or site peak periods, and overall traffic increases are expected to be modest and capable of being absorbed by the local street network. The local road network can accommodate site traffic, including two-way movement at access points, and broader network impacts, including on Ryde Road and Pittwater Road, are expected to be minimal.	TfNSW's submission did not raise any objections regarding the capacity of the existing road network to accommodate traffic generated by this proposal. Nor did it raise concern with the validity or quality of data used to inform the Traffic Impact Assessment. TfNSW also notes the Strategic Bushfire Study's finding that the surrounding road network provides multiple direct and efficient routes and entry points for emergency response vehicles. The PPA Team also sought advice from the Department's internal Transport Advisory team, which advised that the Transport Impact Assessment is prepared in accordance with relevant guidelines and adequately demonstrates the transport and traffic requirements to support the planning

	heavy vehicles using local streets and are concerned about noise, operational impacts, and loading activity to nearby dwellings. Community groups specifically oppose new loading and parking access from Barons Crescent, preferring heavy-vehicle access from High Street Network-Wide and Cumulative Impacts Submissions highlight broader traffic impacts on Ryde Road, Pittwater Road and Boronia Park, including existing “rat-running” and traffic speeds. Residents point out that Council’s traffic studies already identify issues in the precinct and are concerned that the proposal does not adequately account for cumulative impacts of other developments and policy changes. Some also argue that the proposal reinforces car-dependency, with limited provision for cycling or active transport and insufficient evidence of integrated land-use and transport planning. Traffic Assessment and Data Quality Residents raised concern about the adequacy of traffic and access reports, noting reliance on 2021 (COVID-era) counts and selective omission of local roads where traffic volumes already	Two vehicle access points are proposed: the existing High Street access and a relocated Barons Crescent access. The Barons Crescent access is safer than the current arrangement because it is located away from intersections and on a straight section of road. Limiting all major vehicle access to High Street is not supported. Servicing vehicles other than waste collection will use the Barons Crescent access, with a turning bay enabling forward-in and forward-out movements. A total of 218 on-site parking spaces is provided, which complies with and exceeds SEPP Housing and TfNSW requirements and reduces pressure on surrounding streets.	proposal. More detailed matters relating to local congestion, intersection performance, service vehicle routing, parking demand, road safety and final access design can be further assessed and refined through future development applications, supported by updated transport and traffic analysis where required. Having regard to TfNSW’s advice that there are no state-road capacity or access issues identified at the planning proposal stage and the Department’s Transport Advisory team confirming the studies are adequate, the PPA Team is satisfied that traffic and transport issues have been adequately addressed to the level required at this stage and do not prevent the planning proposal from proceeding to finalisation.
--	---	--	--

Summary of Submissions

PP-2023-1109



	exceed environmental capacity thresholds. Community groups call for a new, independent Transport Impact Assessment, with fresh counts that reflect current conditions, recent developments and future policy-driven traffic growth.		
Character, Visual, & Streetscape Impacts <i>56 of 69 submissions (81%)</i> <i>Includes neighbourhood character, visual impact, streetscape, outlook, light pollution, transition, setbacks, treescape protection and sense of openness.</i>	Consistency with Existing Character and Streetscape Submissions describe the area as a quiet, low-rise, leafy residential environment with detached homes, generous setbacks and significant trees, including the bushland setting of Boronia Park. Residents consider the proposed multi-storey buildings to be inconsistent with this character and fear a permanent shift from “bushland suburb” to an urban or institutional feel. They are concerned that buildings of up to 24 m in height would dominate the streetscape, alter long standing views and create a continuous. Submissions also noted the potential for closely spaced wall of higher built form along Gaza Avenue and Barons Crescent, with limited articulation to reduce apparent bulk. Community groups highlight the replacement of a single storey cottage on the Gaza/Barons corner with a four storey	The Planning Proposal implements Council’s Local Housing Strategy while responding to Hunters Hill’s residential and garden suburb character. The site’s landscape character is retained and enhanced, with additional DCP controls for character, building form, landscaping, finishes and materials. As described above, taller buildings are concentrated centrally, set back from surrounding homes, and step down towards the site boundaries to provide a transition to neighbouring low-rise dwellings. Visual impacts are managed through siting, separation, setbacks, upper-level setbacks, roof plant controls, varied building forms and landscaped setbacks. The proposal also respects the heritage gardens and Montefiore House and remains compatible with	The PPA Team acknowledges the concerns the community have raised regarding the potential impact future development on site may have on the existing character and streetscape of the area. As noted above, both the Panel and the Department separately determined that the Planning Proposal, as it relates to height and floor space ratio controls, demonstrated sufficient strategic and site-specific merit to be supported. Council’s adopted Local Housing Strategy does not recommend specific built form controls for the site, however it does acknowledge that the site has with potential to undergo master planning and redevelopment. The rezoning is the first part of this process. The Low and Mid-Rise Housing Policy will also likely result in changes to the low-rise residential character surrounding the site, irrespective of the

Summary of Submissions

PP-2023-1109



	building as an example of unacceptable visual change. They also state that development must “maintain and enhance the character and identity of established neighbourhoods” under the <i>Hunters Hill LEP 2012</i>. Outlook and Sense of Openness Many submissions emphasise the loss of outlook to trees and sky, replaced by views of tall buildings, balconies and lighting. Residents, particularly older people who have lived in the area for decades, describe a likely reduction in their sense of openness, seclusion and quiet enjoyment of outdoor spaces Light Spill and Night-Time Impacts Residents are also concerned about light spill from taller buildings, car parks and accessways, particularly given the current low level of night-time lighting in surrounding streets and bushland. They note that constant lighting would change the night character of the area for both residents and wildlife. MRCAA specifically links light spill to impacts on nocturnal fauna in adjacent bushland.	the broader Hunters Hill heritage character. Significant environmental features and important views are protected, the Masterplan retains as many mature high and medium significance trees as possible, and additional landscaping and canopy planting are required at DA stage. Light spill from buildings and security lighting will be addressed through a lighting assessment at DA stage, with lighting designed to minimise impacts on nearby homes and surrounding bushland.	outcomes of this planning proposal. The building form will be further refined to address visual impact, light pollution, transitions and setbacks during the DA stage. Further fine grain detail controls addressing these matters can also be addressed through Council’s DCP for the site. The PPA Team considers that the character, visual and streetscape concerns are matters for detailed design and assessment and do not prevent progression to finalisation.
Amenity Impacts 43 of 69 submissions (62%)	Privacy, Sunlight, and Residential Amenity Residents consider that the combined	Generous landscaped setbacks to the property boundary, road carriageway widths, retained street	The PPA Team acknowledges concerns regarding privacy, solar access, noise and light spill.

Summary of Submissions

PP-2023-1109



<i>Includes residential amenity, liveability, privacy and overlooking, overshadowing, solar access, noise and light, and quality of life.</i>	effects of increased building scale and activity will significantly diminish amenity for surrounding homes. Submissions frequently raise concerns about loss of visual and acoustic privacy from four and six storey buildings facing low rise dwellings, with residents anticipating overlooking into living rooms, gardens and bedrooms and a reduced ability to use front gardens and verandahs without screening. Residents also expect taller buildings to overshadow nearby homes, gardens and communal spaces, particularly during winter, with some noting potential impacts on rooftop solar systems and garden planting. Older residents and retirees, who spend more time at home and rely on sunlight, outlook and local walking routes, are seen as particularly affected. Some submissions also refer to increased stress, reduced quality of life and possible mental health impacts arising from the scale of change and prolonged disruption.	trees and existing setbacks to adjoining properties provide sufficient separation to reduce amenity impacts on neighbours to an acceptable level. Privacy is addressed through site and building separation, building orientation, landscaped setbacks and both existing and proposed landscaping. The relevant Apartment Design Guide separation requirements can be met, achieving good internal and external visual privacy. Overshadowing is addressed through shadow diagrams prepared as part of the Planning Proposal package. Those diagrams confirm that shadowing from the proposed building envelopes is contained within the site and does not affect neighbouring dwellings, gardens, solar panels or public spaces. Compliance with the Apartment Design Guide for direct sunlight and cross-ventilation is also achieved. Noise impacts are mitigated through the separation and orientation of buildings, with more detailed acoustic assessment to occur at DA	The extent of these impacts depends on the detailed design, including siting, separation, balcony and window orientation, screening, and operational layout. These matters are most appropriately resolved through detailed assessment at DA stage, supported by overshadowing diagrams, privacy and view impact analysis, and acoustic and lighting reports. Construction-phase amenity impacts, such as temporary noise, dust, vibration and traffic, are likewise managed through conditions applied to any future DAs. The PPA Team is satisfied that amenity impacts can be comprehensively addressed during subsequent DA assessments and that they do not preclude the proposal progressing to finalisation.
--	--	---	--

Summary of Submissions

PP-2023-1109



		stage, including traffic, servicing, loading, plant equipment and operational activity. A Loading Operational Management Plan will also be required with any future DA.	
Parking Supply, Overflow & Management <i>39 of 69 submissions (57%)</i> <i>Includes parking scarcity, street parking overflow, adequacy of on-site parking for staff, residents and visitors, parking under-use, and construction-phase parking impacts.</i>	Adequacy of On-Site Parking and Allocation Many submissions have concerns about whether the number of proposed on-site parking (e.g. for ILUs, staff, visitors and communal uses) is sufficient, noting that some scenarios allow only a small proportion of spaces for staff despite peak staffing levels. MRCAA highlights uncertainty about the total number of spaces, including references to a possible second basement level, and is concerned that this ambiguity conceals the true parking and traffic impacts. Lack of Clear Management and Mitigation Submissions note a lack of detailed, enforceable strategies to manage parking demand and overflow, including staff parking policies, visitor parking controls or potential measures such as shuttle services or parking restrictions. Residents are concerned that, in practice, nearby	A total of 218 on-site parking spaces is provided. This complies with, and exceeds, applicable SEPP Housing and TfNSW requirements and accommodates staff, residents and visitors within the site, reducing reliance on on-street parking along Barons Crescent, Gaza Avenue and High Street. Overflow parking onto surrounding streets is not expected to increase. Increased on-site parking allows staff and visitors who currently park on surrounding streets to park within the basement instead. The basement shown in the Masterplan is sufficient to accommodate additional parking if required, subject to future DA assessment. Parking demand and use are managed through a consolidated basement and on-site parking layout, with any further management measures able to be	The planning proposal sets the land use and density framework but does not determine final parking numbers or allocation. Those matters are established through future DAs, which at this stage can also address overflow issues. TfNSW raised no issues with the proposed parking levels in their submission. The PPA Team considers that parking supply and management remain matters for detailed design and can be addressed satisfactorily at DA stage and do not prevent the planning proposal from being finalised.

Summary of Submissions

PP-2023-1109



	streets will absorb much of the additional parking load.	reinforced through conditions of consent at DA stage.	
Sets Precedent <i>33 of 69 submissions (48%)</i> <i>Includes precedent for further height and density, spot rezoning, and cumulative impacts on low-density areas.</i>	Future Uplift on this and Other Sites Residents are concerned that rezoning to <i>SP2 Infrastructure (Seniors Housing)</i> and FSR and heights uplift would set a precedent for similar uplifts both on this site and on other institutional lands across Hunters Hill. Community groups regard this as a serious strategic risk to the character of Hunters Hill and similar suburbs Integrity of Planning Controls Submissions argue that approving such a significant departure from existing <i>R2 Low Density Residential</i> controls risks undermining confidence in the <i>Hunters Hill LEP 2012</i> , <i>DCP</i> and <i>Seniors Housing Design Guide</i> , and may signal that spot rezonings can be used to circumvent established height and density settings in low-density suburbs.	The Planning Proposal does not set a precedent for future development across the LGA. The site is one of only two identified in Council's Local Housing Strategy for master-planning and future housing growth, and it is specifically identified for seniors housing. As described above, the proposed <i>SP2 Infrastructure (Seniors Housing)</i> zoning secures the site's future use for seniors housing and associated ancillary facilities. It does not bypass existing planning controls or undermine the LEP.	The PPA Team acknowledges community concerns that allowing additional height and density on this site may encourage similar proposals elsewhere. This planning proposal has been subject to various merit assessments, which concluded there was merit in the proposed uplift. Any future proposal on other land would need to demonstrate its own strategic merit and respond to its own site conditions, including bushfire risk, infrastructure capacity, local character and access constraints. The PPA Team is satisfied that the matter raised by the community have been adequately addressed and do not prevent the progression of the planning proposal.
Assessment Adequacy & Independence <i>28 of 69 submissions (41%)</i> <i>Includes adequacy,</i>	Adequacy and Scope of Impact Assessments Residents consider that several key impacts have not been fully or clearly assessed at the planning proposal stage.	The Planning Proposal is supported by a comprehensive suite of technical studies, together with a Masterplan and draft indicative site-specific DCP, which provide the	As part of the public exhibition and assessment process, key agencies reviewed the proposal and provided advice that the supporting studies were adequate for the planning proposal.

Summary of Submissions

PP-2023-1109



<i>currency and independence of traffic, bushfire, heritage, social and other technical studies, reliance on COVID-era traffic counts, outdated community needs and heritage data, and omissions in evidence.</i>	They are concerned that significant matters are being deferred to later stages and point to specific examples such as flood studies, infrastructure servicing, and emergency management issues that are seen as incomplete, insufficiently resolved or not tested in enough detail to support rezoning. Independence and Reliability of Technical Studies Many call for updated, independent expert reports to provide a robust evidence base. The Hunters Hill Trust and MRCAA specifically recommend that key supporting documents (including traffic, bushfire, heritage and social impact assessments) be replaced or supplemented by up-to-date reports prepared by appropriately qualified independent experts.	basis for the proposed LEP controls over land use, zoning, height, floor space ratio and built form. Key matters including traffic, amenity, heritage, environmental impacts and infrastructure have been assessed at the strategic level appropriate to a planning proposal. Further detailed assessment at DA stage is appropriate and conventional. Detailed design, final layouts and architectural resolution are matters for that stage, together with enforceable conditions. Traffic, bushfire and other technical matters have not been left unexamined. The publicly exhibited Transport Impact Assessment uses conservative assumptions consistent with TfNSW guidance, and the proposal is also supported by environmental, landscape and bushfire studies, including the Strategic Bushfire Strategy and concept landscape strategy.	The consent authority retains the ability at DA stage to require updated, independent and discipline-specific reports responding to the final design and staging, including new traffic and parking surveys, refreshed social and community needs analysis, and more detailed heritage, environmental and bushfire material. In the PPA Team's view, the combination of current agency advice and DA-stage assessment process addresses concerns about adequacy and independence and do not warrant refusal of the proposed LEP amendment.
Social Impact & Community Benefit <i>27 of 69 submissions (39%)</i>	Impacts on Vulnerable Populations and Displacement Submissions highlight that frail elderly residents and people with disabilities may	As described above, the proposal is based on a broader continuum-of-care model that supports ageing in place and allows residents to	The PPA team note the issues raised regarding the potential social impact from the redevelopment of the site and perceived lack of community benefit.

Summary of Submissions

PP-2023-1109



<i>Includes social impacts on existing residents, vulnerable populations, local lifestyle, and claimed community benefits.</i>	be especially affected by changes in access, noise, and safety conditions. Residents are concerned that these impacts would fall most heavily on people who are less able to adapt to increased traffic, more complex movement conditions and a busier local environment. Some also raise concerns about potential displacement of existing residents if current housing is redeveloped. Community Benefit and Social Infrastructure Need Residents question how, in practical terms, the proposal benefits people already living in Hunters Hill, in relation to access to care, local services, or shared spaces. Many consider community benefit to be vaguely described and not commensurate with the scale of uplift sought. Community groups are critical of the Community Needs Assessment, arguing that it does not provide an independent, up-to-date analysis of social infrastructure needs or clearly identify how the proposal will meet local community needs.	transition through different levels of care within the same community. Although the final mix of aged care beds and ILUs will be determined at DA stage, a substantial level of high-care accommodation is retained alongside ILUs and support services. The proposal also delivers community benefit by increasing housing choice for older people in Hunters Hill, supporting allied health and other on-site services, and allowing older residents to remain close to family, services and support networks. Public interest and equity are addressed through the retention of essential aged care services, a broader mix of seniors housing, and concessional housing through Montefiore's charter.	The matters raised around social impact, particular around the impacts from the redevelopment of the site, will be considered as part of any future DA. The relevant consent authority would need to ensure these matters are addressed prior to issue a consent. The Community Needs Assessment can also be updated with a future DA to better demonstrate demand and explain how the mix of RACF beds, ILUs and on-site facilities serves local and wider community needs. The PPA Team considers that social and community-benefit issues are best assessed when detailed designs and service models are available, and they do not prevent the planning proposal from progressing to finalisation.
Proposal Detail, Consistency, & Outcome Certainty	Masterplan Detail and Certainty Residents note the absence of a clear, binding masterplan showing final building	The Planning Proposal is supported by a Masterplan, draft indicative site-specific DCP and technical	The PPA Team acknowledges concerns about the indicative nature of the masterplan, inconsistencies in the

Summary of Submissions

PP-2023-1109



<i>26 of 69 submissions (38%)</i> <i>Includes level of detail in exhibited material, internal consistency, clarity on building uses and staging, and certainty about final outcomes.</i>	locations, heights, functions and staging. They are concerned that approving broad controls without this detail could allow very different outcomes at DA stage. Community groups consider the current “indicative” masterplan and Draft Site-Specific DCP to be inadequate and call for these documents to be finalised before any rezoning is approved. Inconsistencies and Ambiguities Submissions point to errors (including street name typos), unclear ILU numbers, and inconsistencies between different documents (e.g. drawings versus text), which undermine confidence and make it difficult for residents – especially older ones – to understand the proposal. MRCAA also highlights uncertainty around Building B’s ultimate use and the number of basement levels, which contributes to concern about traffic and parking impacts.	studies that establish a clear framework for future land use and built form. It includes binding controls for land use, maximum building heights, floor space ratio and zoning, with the Masterplan showing one acceptable outcome. Final design, layouts and architectural detail are matters for DA stage. As described above, traffic, amenity, heritage, environmental impacts and infrastructure have been assessed at the strategic level appropriate to rezoning and will be subject to more detailed, enforceable controls at DA stage. Changes to access arrangements and land uses were informed by technical assessment, consultation and agency feedback, and the ultimate mix of uses within Building B will be determined at DA stage.	exhibition material, and uncertainty about final outcomes. However, the concept masterplan submitted with the planning proposal is indicative only, and the planning proposal process does not result in a fixed and binding masterplan for the site. The proposed LEP amendment does, however, lock in the key planning controls relating to zoning, building height and FSR, which all future proposals must follow. Council will be responsible for preparing and adopting any future DCP for that site, which will provide further certainty on design outcomes. The PPA Team considers that issues around documentation detail and outcome certainty are manageable and do not prevent the planning proposal from progressing to finalisation.
Planning Policy Compliance & Strategic Merit <i>25 of 69 submissions (36%)</i> <i>Includes consistency with</i>	Consistency with Local Planning Objectives Residents argue that the proposal conflicts with <i>Hunters Hill LEP 2012</i> objectives to maintain and enhance neighbourhood character and protect residential amenity	The Planning Proposal implements Council’s Local Housing Strategy for this identified strategic site and responds to Hunters Hill’s established residential and garden suburb character. As described	As noted above, both the Panel and the Department separately determined that the Planning Proposal, as it relates to height and floor space ratio controls, demonstrated sufficient strategic and site-specific merit to be supported.

Summary of Submissions

PP-2023-1109



<i>LEP and DCP objectives, Housing SEPP, Seniors Housing Design Guide, and broader strategic planning principles.</i>	and environmental qualities. They consider the height and density uplift inconsistent with <i>R2 Low Density Residential</i> zoning and intended two-storey character. Strategic Merit and Location Residents question whether the site, being over 800 m–1.2 km from shops and not adjacent to major transport hubs, is an appropriate location for high-intensity seniors housing under State policy. They consider strategic justification to be weak and not supported by clear evidence of local need.	above, lower heights are retained along Gaza Avenue and High Street, taller buildings are concentrated within the centre of the site, and building heights reduce towards the site boundaries to provide a transition to neighbouring low-rise dwellings. Strategic merit arises from the site's role as an existing seniors housing campus and from its identification in Council's strategic planning framework for renewal and additional density. Seniors housing does not depend on the same level of proximity to centres and high-frequency public transport as general residential development. The site has access to Boronia Park Reserve, Boronia Park village, local bus route 538 and a private resident shuttle service.	Council's adopted Local Housing Strategy does not recommend specific built form controls for the site, it does acknowledge that the site has potential to undergo master planning and redevelopment. For the purposes of the planning proposal stage, the PPA Team considers that the proposal, as reviewed by agencies, aligns with the required frameworks and merit tests, meets the required standard to proceed to finalisation.
Environmental and Heritage Impacts <i>23 of 69 submissions (33%)</i> <i>Includes tree removal, bushland degradation, biodiversity, stormwater, impacts on heritage</i>	Tree Removal and Bushland Degradation Residents object to extensive tree removal, including heritage-significant trees such as Monterey Pines and Bunya Pine, and are concerned about ongoing degradation of bushland character. They	The proposal has been master-planned to retain and respect the heritage significance of the Montefiore heritage garden. The heritage garden curtilage has been expanded and buildings setback to respect the garden, enhance outlook to it and reduce shadowing.	Submissions raise concerns about tree loss, bushland degradation, biodiversity, stormwater and the effect of future development on heritage items. These matters depend largely on the detailed design of any future development rather than the high-level controls proposed through this planning

Summary of Submissions

PP-2023-1109



<i>gardens, trees, buildings and setting.</i>	note that loss of canopy and vegetation reduces habitat and the “bushland ambience” valued by locals and may contribute to an urban heat island effect as hard surfaces and building footprints increase. Heritage Gardens and Setting Submissions emphasise that the Montefiore heritage garden relies on its Gardenesque landscape and setting. Residents fear that tall buildings and increased bulk will overshadow and visually dominate the heritage garden, altering how it is experienced and diminishing its heritage. Heritage Items and Conservation Planning The Hunters Hill Trust stresses the need for a conservation management plan for the whole site – including the heritage garden, synagogue and a World War II communications bunker – prepared by an independent heritage expert. Concern is expressed that reliance on an in-house heritage report is inadequate to guide sensitive development of the site over time. Stormwater, Biodiversity and Downstream Impacts	Future development will be required to demonstrate consistency with heritage objectives through detailed assessment at DA stage. The Masterplan also retains as many mature high and medium significance trees as possible. Additional tree planting and landscaping strengthen habitat value, reinforce the garden character of the site, and expand landscaped areas and tree canopy. Stormwater, biodiversity and urban heat impacts are addressed through a concept landscape strategy and a landscaped design approach that reduces hard surfaces and provides deep soil zones. Stormwater management systems will be incorporated into the future design, with environmental impacts continuing to be assessed and managed at DA stage. The site’s environmental context has informed a sensitive design response, and the ultimate development will not impact Boronia Park, the Lane Cove River or the Great North Walk.	proposal. At DA stage, the layout, built form, landscaping and servicing can be designed so that key environmental and heritage issues are properly managed, including tree retention where feasible, new planting and deep soil areas, protection of bushland and habitat, stormwater and water sensitive urban design measures, and careful treatment of the Montefiore garden and other sensitive parts of the site. The PPA Team considers that environmental, stormwater and heritage concerns can be properly managed and do not prevent the planning proposal from proceeding to finalisation.
--	--	--	--

Summary of Submissions

PP-2023-1109



	Residents also raise concerns about intensified stormwater flows from additional hard surfaces, potential impacts on local drainage and downstream flooding, and the adequacy of proposed water-sensitive urban design controls. They highlight possible impacts on local flora and fauna, and some submissions request stronger, enforceable measures – including deep-soil planting, canopy retention targets and wildlife-sensitive lighting – to protect biodiversity and manage runoff to Boronia Park and the Lane Cove River.		
Construction Impacts <i>18 of 69 submissions (26%)</i> <i>Includes construction traffic, parking, noise, dust, vibration, duration and impacts on safety and amenity.</i>	Construction Traffic and Parking Residents anticipate large numbers of truck and contractor movements over an extended construction period, adding to congestion and taking up street parking. They are concerned about access for existing residents, carers and community services during peak construction activities. Noise, Dust and Vibration Submissions highlight prolonged construction noise, dust and vibration from excavation, piling and concrete works. Older residents and those with health issues are seen as particularly vulnerable	Construction impacts are temporary and will be managed through the normal DA processes rather than at rezoning stage. Given the site's size and multiple access points, construction can be coordinated effectively. A preliminary CTMP will be required with any future DA, with final management plans to follow once a builder is appointed. Construction traffic, heavy vehicles and parking will be managed through detailed plans dealing with haulage routes, delivery hours, temporary access and parking, pedestrian and cyclist safety, and	The PPA Team acknowledges potential construction impacts such as additional truck movements, worker parking, temporary congestion, noise, dust and vibration, particularly given the age profile of nearby residents. These impacts are normally managed through conditions of consent requiring Construction Environmental Management Plans and Construction Traffic Management Plans, which set clear rules for working hours, truck routes, parking, vibration controls and dust management. The PPA Team is therefore satisfied that construction impacts can be

Summary of Submissions

PP-2023-1109



	to these impacts. Safety During Construction Residents raise safety concerns about heavy vehicles on narrow streets, temporary traffic management, and the need for robust construction environmental management plans to protect pedestrians and nearby properties.	measures to reduce impacts on local streets. Heavy vehicle access will avoid peak periods, and major works will be staged to limit disruption. Noise, dust, vibration and lighting impacts will be managed at the next stage through standard measures, including a Construction Noise and Vibration Management Plan, dust suppression, and compliance with EPA and Council construction hours. Construction safety will be managed through the same framework, with the surrounding road network able to accommodate short-term construction traffic when properly managed.	addressed through standard development consent mechanisms at the next stage.
Bushfire Risk & Emergency Management <i>15 of 69 submissions (22%)</i> <i>Includes bushfire hazard, APZ compliance, evacuation feasibility, shelter-in-place, and holistic emergency management for a vulnerable resident cohort.</i>	Bushfire Hazard and APZ Compliance Residents note that the site is bounded by Category 1 and 2 bushfire-prone vegetation and reference RFS advice that it should be treated as a greenfield Special Fire Protection Purpose development without concessions. They are concerned that required asset protection zones cannot be fully contained within the site and that current layouts do not demonstrate compliance with <i>Planning for</i>	The presence of Category 1 vegetation adjacent to the site does not, of itself, preclude development. Bushfire risk has been addressed at the strategic planning stage in accordance with Planning for Bushfire Protection 2019, with APZs resolved with the RFS and the SP2 Infrastructure (Seniors Housing) mapping outline reduced in response to RFS requirements.	The PPA Team notes that bushfire risk is considered through the Strategic Bushfire Study and several rounds of advice from NSW RFS. The RFS's latest submission states that it can support rezoning to SP2 Infrastructure (Seniors Housing) if the SFPP APZs identified in the Strategic Bushfire Study are used to define the rezoning area, including a 60-metre SFPP APZ to the north-east. In

	<i>Bushfire Protection 2019 (PBP 2019).</i> Evacuation of Elderly and Mobility-Impaired Residents Submissions express serious concern about evacuating large numbers of frail and mobility-impaired residents along narrow streets and potential bushfire “pinch points”, particularly given limited evacuation routes and the risk of roads being blocked. Many residents consider evacuation feasibility a critical, yet unresolved, issue. Shelter-in-Place and Holistic Risk Management Residents are wary of relying on shelter-in-place strategies, especially where existing RACF buildings have been excluded from some assessments. Community groups are particularly critical of treating the rezoning area and the existing RACF separately and call for a holistic bushfire strategy covering the whole site, with consistent standards for both RACF beds and ILUs. Adequacy and Independence of Bushfire Studies Submissions criticise the Strategic Bushfire Study as incomplete and request updated, independent assessments	Current NSW bushfire policy does not treat evacuation as the primary life safety measure, instead relying on defensible space, appropriate construction standards and reliable firefighting access. Access, traffic capacity and emergency management are matters for future DAs and must comply with PBP, with planning for vulnerable populations to be resolved at later stages in consultation with emergency services. The bushfire assessment is strategic-level appropriate to a planning proposal and focuses on the parts of the site affected by the proposal, as agreed with the RFS. More detailed assessment of building and access design, construction standards and evacuation procedures will occur at DA stage. The Strategic Bushfire Strategy was prepared at the request of the RFS and demonstrates that the site is strategically capable of accommodating development subject to appropriate DA controls. The ultimate mix of uses within	response, the Proponent has proposed the north-east APZ land remains zoned R2 Low Density Residential and SP2 Infrastructure (Seniors Housing) applies only outside the required SFPP APZs, which adequately addresses the RFS’s concerns. TfNSW also notes that the surrounding road network provides multiple direct and efficient routes and entry points for emergency vehicles, supporting emergency access and evacuation at a network level. More detailed matters such as evacuation procedures, any shelter-in-place arrangements, and construction standards under Planning for Bushfire Protection 2019 are worked through at DA stage. Given the proposed land use zoning and agency comments, the PPA Team considers that bushfire and emergency management concerns have been addressed and do not prevent the proposal from proceeding to finalisation.
--	--	--	---

Summary of Submissions

PP-2023-1109



	demonstrating compliance with <i>PBP 2019</i> , providing BAL ratings, and addressing climate-change-exacerbated fire behaviour and emergency access/egress.	Building B will be determined at DA stage through a performance-based approach.	
--	--	---	--