

Resident, Alcove's Building E

132 Killeaton Street, St Ives NSW 2075

31 July 2026

Minister for Planning and Public Spaces

c/- Department of Planning, Housing and Infrastructure

Re: Submission on SSD-98363228, Montefiore Seniors Housing, 19-25 College Crescent and 9-15 Link Road, St Ives

I have lived at the Alcove Apartments, 132 Killeaton Street, for over 10 years. My building sits directly on the northern boundary of this site, and I am writing to object to a proposal that would place an eight-storey building directly opposite our homes, more than three times the height the state's own planning policy allows for seniors housing. I support seniors housing on this site in principle, but not at this scale.

No height or floor space ratio control applies under the Ku-ring-gai Local Environmental Plan 2015, so this is being assessed purely on merit. State Environmental Planning Policy (Housing) 2021 sets its own benchmark regardless: 9.5m, or 11.5m with fully screened roof plant, and an FSR of 0.5:1 for independent living units or 1:1 for residential care. This proposal reaches 30.2m for Building A and 27.6m for Building D, over three times that benchmark, with an FSR of 1.74:1. The applicant's own compliance table acknowledges this and asks for it to be accepted on merit alone. A threefold breach of the state's own benchmark deserves real scrutiny, not routine approval.

It is also out of step with what is around it. The applicant's own EIS describes the area as three to six storey residential flat buildings, aged care facilities and schools. The Alcove Apartments are five to six storeys, and Chabad North Shore reaches five. An eight storey, 30.2m building bears no relationship to that context, however it is stepped or landscaped.

This isn't only a concern for my own unit. Alcove's Building E faces the site directly across the shared boundary, five storeys against Building D's eight directly opposite. Its whole south face is lined with bedrooms across nine ground floor units, two of which, one at each end of the building, have private courtyards opening directly onto the boundary, and the top floor's terraces wrap around to face north, south and east. A walking loop circling the entire Alcove complex, already marked on the applicant's own interface drawing, also runs along this boundary. In place of open land, residents and visitors of Building D would be looking directly into our bedrooms, terraces, courtyards and that walking loop, a complex wide impact, not just mine.

The assessment itself reflects this imbalance. The EIS names College Crescent, Chabad North Shore and Masada College as key sensitive receivers, but gives no equivalent treatment to the Alcove Apartments, despite it housing around 300 apartments on the boundary, more residents than the other three combined. It also omits a distinct impact: daylight loss. Our affected windows and terraces face south and rely on ambient sky light rather than direct sun, so a tall building close to this boundary reduces daylight regardless of the shadow question, an impact not assessed anywhere in the application. Section 97 of the Housing SEPP requires the consent authority to be satisfied the design considers the Schedule 8 design principles, including neighbourhood amenity and setbacks that reduce bulk and overshadowing, the same provision Council relied on to object to bulk and amenity impacts at 285-289 Mona Vale Road. That test cannot be satisfied for the Alcove Apartments when this interface has not been properly assessed.

At 285-289 Mona Vale Road, the Commission heard a neighbour's amenity concerns directly and required specific privacy treatments in response, including balcony and window positioning to reduce overlooking, vertical louvres facing neighbouring dwellings, and conditioned landscaping with mortality replacement for

the life of the development. Nothing equivalent has been considered for the Alcove Apartments. The Department should require the same standard of privacy assessment and conditions for Alcove's Building E, including an accurate height comparison drawing and the effect on outlook and amenity for our windows, balconies, courtyards and the walking loop, before this application is determined.

The need case doesn't stack up at this scale either. The applicant's Social Impact Assessment cites an 89.1% aged care occupancy rate across the whole Northern Sydney region as evidence of demand, a large regional figure covering residential care beds only, not the 126 independent living units that make up most of this proposal. A 145-bed facility is already approved at 285-289 Mona Vale Road, with a further 62 beds under assessment, built within the Housing SEPP benchmark, 9.5m generally and 11.5m only for plant rooms, and with detailed privacy sections prepared for the specific neighbouring units it adjoins. That capacity was delivered without tripling the height benchmark, and with exactly the kind of neighbour-specific assessment this proposal has skipped for the Alcove Apartments.

This isn't just a case of the proposed height being dramatically taller than the existing aged care buildings nearby, it also breaches the height limits that legally apply to every comparable site. 101 Killeaton Street, a 125-place facility approved by the Land and Environment Court, sits on R2 land capped at 9.5m and 0.3:1 FSR, with no recorded height variation. 1 Yarrabung Road received only an 11 percent variation, and only for slope and lot size, via the Sydney North Planning Panel. Even 251-257 Mona Vale Road, zoned R4 for high density, the most permissive zoning in the area, is capped at 17.5m and 1.3:1. Size isn't the excuse either: the seniors living site spanning 2-8 Kitchener Street, 42 Roma Road and 385 Mona Vale Road covers almost 3.8 hectares, more than double this site, and is still capped at 9.5m. Nowhere nearby comes anywhere near 30.2m.

There is a broader concern too. This site avoids rezoning entirely because the Housing SEPP permits seniors housing on SP2 land as an exception to normal zoning, an exception that comes with its own height and FSR ceiling built in for this situation. A threefold breach of that ceiling removes the one safeguard attached to the mechanism that let this application exist without rezoning, setting a precedent for other unconstrained sites nearby.

I am asking the Department to require this proposal to comply with the Housing SEPP's benchmark, 9.5m, or 11.5m with fully screened roof plant, and an FSR of 0.5:1 for independent living units or 1:1 for residential care, rather than approving a threefold exceedance on merit. Any departure should be justified by a genuine site constraint, as at 1 Yarrabung Road, not by design or demand arguments that could apply to almost any site. I am also asking for a far more rigorous assessment of the proposal's impact on amenity, bulk and overlooking of the Alcove Apartments, with specific measures to minimise overlooking of our windows, balconies, courtyards and the walking loop, before any consent is granted. I am happy to provide further information if it would help.

Yours sincerely,

A resident of Alcove's Building E
132 Killeaton Street, St Ives NSW 2075