

# SUBMISSION OF OBJECTION

State Significant Development Application SSD-98363228

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**To:** Department of Planning, Housing and Infrastructure

**Application:** SSD-98363228 - Montefiore Seniors Housing, St Ives

**Submitter:** Chunru Lu

**Address:** 22 College Crescent, St Ives NSW 2075

**Position:** I object to the application.

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## Introduction

I object to the proposed Montefiore Seniors Housing development because I do not believe this proposal has adequately addressed its impacts on the surrounding community. As a resident of 22 College Crescent who has lived directly opposite the site for almost 20 years, my family will be among those most affected by the development. Having carefully reviewed the Environmental Impact Statement (EIS) and supporting technical reports, I am concerned that they underestimate the practical impacts on neighbouring residents, particularly in relation to traffic, visual amenity, construction and emergency planning. I respectfully request that the Department carefully consider the following concerns before determining the application.

Photographs referred to in this submission are provided in Appendix A.

## 1. Traffic and Access Remain Major Concerns

Traffic remains one of my greatest concerns. As a resident living directly opposite the proposed development for almost 20 years, I experience the existing traffic conditions on College Crescent every day. In my view, the conclusions reached in the Transport Impact Assessment (TIA) do not adequately reflect the day-to-day operation of the local road network, particularly during periods of heavy activity associated with nearby schools, community facilities and religious organisations.

While the TIA concludes that the surrounding road network has sufficient capacity to accommodate the additional traffic generated by the proposal, I do not believe it adequately considers how the development will operate within an already constrained residential street that regularly experiences congestion, competing traffic movements and high pedestrian activity.

### Existing traffic conditions

College Crescent and Link Road already carry significant traffic associated with Masada College, nearby educational facilities, community activities and existing residential development. During school drop-off and pick-up periods, traffic queues, buses, parked vehicles, pedestrians and turning vehicles combine to create a complex traffic environment.

From my observations over many years, the main Masada College drop-off and pick-up area is located on Link Road. However, a significant number of parents also use the rear gate on College Crescent, particularly during the afternoon pick-up period (Photograph 1 and Video 1). As a result, College Crescent already experiences increased traffic, kerbside parking and pedestrian movements during the busiest parts of the school day. Apart from this school-related traffic, there is no kerbside parking restriction on the development side of College Crescent, and on-street parking there is frequently full (Photograph 2 and Video 2).

The applicant acknowledges that residents raised concerns regarding increased traffic on College Crescent and Link Road. However, the response is largely limited to referring to the Traffic Impact Assessment and the provision of on-site parking.

In my opinion, providing adequate on-site parking does not address the broader issue. Congestion in this area is caused by the interaction of vehicles, pedestrians, buses, school activities and turning movements, rather than simply a shortage of parking spaces.

### **Traffic modelling does not reflect actual operating conditions**

The TIA concludes that surrounding intersections will continue to operate within acceptable Levels of Service based on traffic modelling. However, these modelled results do not fully reflect the conditions regularly experienced by local residents.

Living directly opposite the site, I routinely observe traffic queues, vehicles waiting to turn, pedestrians crossing between parked vehicles and drivers manoeuvring around congestion. These interactions create delays and safety concerns that are difficult to capture through intersection modelling alone.

I also note that some of the traffic surveys were undertaken during periods that may not represent normal school activity. For example, one survey was undertaken in November after Year 12 students had completed the Higher School Certificate, while another was undertaken during the final days of the school term when many senior students had already finished examinations. These periods are likely to experience lower traffic demand than a typical school week. I respectfully request that the Department satisfy itself that the survey data used in the assessment is representative of normal operating conditions.

While the projected peak-hour traffic generation may appear relatively modest, the proposal will generate ongoing vehicle movements from residents, staff, visitors, allied health providers, deliveries, maintenance contractors and emergency services. The cumulative impact of these vehicle movements, particularly during periods when local roads are already under pressure, has not been fully assessed.

### **Additional access points and road safety**

One of my greatest concerns is the proposed access arrangement.

The proposal provides one vehicle access from Link Road together with two separate vehicle accesses from College Crescent. Elsewhere in the application, Link Road is described as the principal access intended to minimise traffic impacts on College Crescent, yet the documentation also indicates that Residential Aged Care Facility and allied health visitors will access the site from College

Crescent. In my view, the operational need for two separate College Crescent driveways has not been convincingly demonstrated.

As a resident opposite the site, I have observed over many years that the combined width of my driveway and the adjoining driveway at 20 College Crescent, together with the wide Chabad entrance opposite (Photograph 3 and 9) is frequently used by motorists as an informal location to undertake U-turns and multi-point turning manoeuvres. While this is my personal observation rather than a formal traffic survey, it reflects existing driver behaviour at this location and should be considered when assessing the safety of introducing additional access points.

The proposed Residential Aged Care Facility driveway would introduce another point where vehicles enter and leave College Crescent immediately adjacent to this existing turning area. This has the potential to increase vehicle conflict points, reduce visibility and create additional blind spots for motorists entering or leaving the development.

These concerns are heightened during school drop-off and pick-up periods, Chabad kids holiday programs and other busy community events, when congestion is already significant. Drivers are often required to make turning decisions in a constrained environment with parked vehicles and pedestrians competing for limited road space. I do not believe the TIA has adequately assessed how these existing traffic movements and driver behaviours will interact with the proposed access arrangement.

### **Parking and pedestrian safety**

The proposal will remove approximately six existing on-street parking spaces on College Crescent to accommodate the new driveways and associated restrictions.

I am concerned that the combined effect of reduced kerbside parking, additional vehicle movements and increased driveway crossings has not been fully assessed.

In particular, I request that the Department consider:

- whether the reduction in available kerbside parking will change where parents stop or wait during school pick-up;
- whether children and accompanying adults may cross College Crescent at additional locations because of changed parking patterns;
- the interaction between pedestrians and vehicles entering or leaving the two proposed College Crescent driveways;
- whether the operational impacts on the existing rear-gate pick-up and drop-off activity have been adequately assessed; and
- whether the weekly Friday evening Chabad gathering held at 17 College Crescent, and the Saturday synagogue services held at Masada College and accessed primarily via the Link Road school entrance, have been adequately assessed in relation to cumulative traffic and parking impacts on College Crescent and Link Road.

The proposal also introduces a new primary vehicle access from Link Road together with a pedestrian connection between Masada College and College Crescent. The TIA acknowledges that many students currently cross Link Road informally and that no formal pedestrian crossing exists

between Mona Vale Road and Stanley Street. Given the proximity of the proposed driveway to an active school environment, I request that the Department be satisfied that pedestrian safety has been comprehensively assessed, particularly during school arrival and dismissal periods.

### **Construction traffic**

Construction of a development of this scale has the potential to significantly affect school operations, pedestrian safety and local traffic conditions.

I respectfully request that a detailed Construction Traffic Management Plan be required before construction commences, addressing:

- construction vehicle routes and scheduling;
- school pick-up and drop-off periods;
- pedestrian safety;
- communication with Masada College and nearby residents; and
- measures to minimise disruption to surrounding streets.

### **Cumulative traffic impacts**

Since the preparation of the EIS, Ku-ring-gai Council has commenced the redevelopment of Bedes Forest, immediately opposite my property. The upgraded park will include new recreational facilities that are intended to increase community use.

I was unable to identify any assessment within the TIA of how this committed Council project may interact with the proposed Montefiore development.

While each project may be acceptable individually, I request that the Department consider whether the cumulative impacts of:

- the Bedes Forest redevelopment;
- the Montefiore development;
- existing Masada College traffic; and
- other established community activities

have been adequately assessed, particularly with respect to traffic, parking availability and pedestrian safety.

### **Matters requiring clarification**

Before determining the application, I respectfully request that the Department seek further clarification on:

- the number of Masada College parking spaces that will be lost as a result of the proposed Link Road access and how those spaces will be replaced before any future Masterplan is implemented;
- pedestrian safety associated with the Link Road access and the two College Crescent driveways during school peak periods;

- the impact of removing on-street parking on existing school pick-up and drop-off activity;
- the cumulative traffic impacts of nearby developments and community uses; and
- construction traffic management measures to protect students, pedestrians and surrounding residents.

## **2. Visual Amenity, Privacy and Overshadowing**

Visual amenity, privacy and access to sunlight are some of the most significant impacts my family will experience if this proposal proceeds.

Although the applicant has reduced the height of the proposal from nine storeys to eight storeys, the development remains substantially larger than surrounding residential development and will permanently change the outlook from our home.

Unlike many neighbouring properties, our home does not have a solid front fence or significant screening along the College Crescent frontage. As a result, our property has an open outlook across the existing Masada College oval (Photograph 4 and Video 3). This outlook forms an important part of our daily living environment and contributes significantly to the amenity of our home.

The proposed development would replace this open green outlook with a large multi-storey building immediately opposite our property. While I appreciate that changes to views are not, in themselves, a planning reason to refuse development, I do not believe the Visual Impact Assessment adequately evaluates the effect of this transformation on the homes that will experience the greatest visual change.

### **The assessment does not adequately represent the most affected neighbouring properties**

The Visual Impact Assessment relies on a series of representative viewpoints from public locations.

However, none of these viewpoints accurately represents the perspective from my property, despite it being located directly opposite the development with an open frontage and unobstructed views toward the site (Photograph 4 and 9).

As a result, the assessment does not properly demonstrate how the scale, bulk and visual dominance of the proposed buildings will be experienced by residents living immediately opposite the development.

I respectfully submit that the Department should place limited weight on representative viewpoints that do not accurately depict the properties most directly affected.

### **Privacy impacts**

The proposal introduces numerous apartments, balconies, communal areas and circulation spaces overlooking existing residential properties.

Although the EIS discusses building setbacks, landscaping and architectural treatments intended to reduce overlooking, I do not believe sufficient assessment has been undertaken of how these measures will protect the privacy of the neighbouring homes directly opposite the site.

The assessment focuses primarily on compliance with planning controls rather than the practical experience of residents who will live opposite an eight-storey development.

### **Overshadowing**

The overshadowing assessment concludes that the proposal generally complies with the applicable planning controls.

However, I remain concerned that the assessment does not adequately consider the practical impacts on my family's daily use of our home.

My mother is 81 years old and has lived with us for almost 20 years. We provide her accommodation, daily care and support. She spends much of her day in the front part of our home facing the proposed development, including her bedroom, the front lounge and the front veranda, where she regularly practises Tai Chi and Qi Gong (Photograph 5a). She also walks around the local streets each day for exercise.

These areas currently benefit from an open outlook across the existing oval and good access to natural light. The proposed development will fundamentally change that environment through its scale, increased built form and additional overshadowing.

I also note that previous documentation assessed overshadowing at 2:15 pm, whereas the revised architectural assessment adopts 2:30 pm. While this may appear to be only a 15-minute difference, it makes direct comparison between the assessments more difficult and may affect the interpretation of afternoon shadow impacts. I respectfully request that the Department satisfy itself that the revised assessment accurately reflects the actual impacts on neighbouring properties.

In addition, our household's electricity costs are already high because of daily pool filtration and charging our electric vehicle. To help offset these costs, I have been planning to install a rooftop solar and battery system and have already obtained a formal quote. Because part of my roof is already occupied by the existing solar pool heating panels, the roof plane facing the proposed development is the most practical location for the new solar panels installation (Photograph 6). Increased overshadowing from the proposed buildings may significantly reduce the effectiveness of this planned solar generation, yet this potential impact has not been considered in the assessment.

### **Cumulative residential amenity**

While each of the visual, privacy and overshadowing impacts may individually be considered acceptable, I believe the Department should also consider their cumulative effect.

For my family, this proposal does not simply introduce a taller building opposite our home. It replaces an open landscape with an intensive eight-storey development that will permanently change our outlook, reduce our sense of openness, increase overlooking and alter the daily environment experienced by my elderly mother, my husband, my daughter and myself.

Given that our property is one of the homes most directly affected, I respectfully submit that these impacts warranted a more detailed and property-specific assessment than has been provided.

## **3. Construction Impacts**

The Environmental Impact Statement acknowledges that construction of the proposed development will occur over an extended period of around 30 months. While I recognise that construction is an unavoidable part of any major development, the scale, duration and proximity of these works mean that neighbouring residents will experience prolonged disruption to their daily lives.

For my family, these impacts are not theoretical. Our home is located directly opposite the proposed development and will be exposed to demolition, excavation, heavy vehicle movements, construction activity and associated noise for the full duration of the project.

### **Impact on working from home**

My husband and I are both senior IT professionals and each work from home for approximately half of our working week. Our daughter is a management consultant and also regularly works from home. All three of us rely extensively on Microsoft Teams and other online collaboration platforms for meetings, workshops, technical discussions and client engagement throughout the working day.

The Construction Noise and Vibration Assessment acknowledges that neighbouring properties will experience elevated construction noise during various stages of the works and that, at times, the recommended construction noise management levels will be exceeded, requiring mitigation measures and management procedures.

While these exceedances may be acceptable from a regulatory perspective, they nevertheless represent a significant impact on households that rely on their homes as professional workplaces. Construction noise from demolition, excavation, heavy machinery, concrete works, truck movements and other activities has the potential to disrupt online meetings, reduce productivity and make it difficult to maintain a professional working environment over what is expected to be an approximately 30-month construction period.

Since the COVID-19 pandemic, hybrid working has become a normal and permanent way of working across many professional industries. However, the assessment appears to give little consideration to the fact that neighbouring homes may now function as workplaces for multiple members of the same household. In our case, three professionals will be directly affected by prolonged construction activity immediately opposite our home.

The assessment generally assumes that construction impacts can be managed through standard mitigation measures. However, there is a significant difference between occasional inconvenience and sustained disruption over a period of around 30 months. For households where the home is also a workplace, prolonged construction noise is not simply an amenity issue - it has the potential to affect our ability to perform our employment responsibilities on a daily basis.

### **Impact on my elderly mother**

As noted above, my mother is 81 years old and has lived with us for almost 20 years. We provide her accommodation, daily care and support, enabling her to continue living with family rather than requiring alternative accommodation or residential care.

She spends much of her day in the front part of our home facing the proposed development, including her bedroom, the front lounge and the front veranda. She regularly practises Tai Chi and Qi

Gong on the front veranda and enjoys the current open outlook across the Masada College oval. She also walks around the surrounding neighbourhood every day for exercise.

The combination of prolonged construction noise, vibration, dust, heavy vehicle movements and the complete transformation of her current outlook will have a much greater impact on her daily life than is reflected in the technical reports.

While construction impacts are described as temporary, a construction period of around 30 months is a substantial period in the life of an elderly person. I do not believe the Social Impact Assessment or Construction Noise Assessment adequately considers how prolonged construction activity will affect elderly residents living immediately opposite the site.

### **Construction traffic and local safety**

Construction of a development of this scale will inevitably involve large numbers of heavy vehicles transporting demolition materials, excavation spoil, construction equipment and building materials.

College Crescent is already a constrained residential street that experiences significant traffic associated with nearby schools, community facilities and religious organisations throughout the week. During school drop-off and pick-up periods, pedestrians, parked vehicles and turning traffic already compete for limited road space.

The introduction of construction vehicles over an extended period has the potential to further reduce road safety, increase congestion and affect the day-to-day amenity of neighbouring residents. These impacts are likely to be particularly significant during periods when pedestrian activity is highest, including school commencement and finishing times.

### **Reliance on future management plans**

Although the EIS proposes a range of mitigation measures, many important details regarding construction management have been deferred to future Construction Traffic Management Plans, Construction Environmental Management Plans and other documents that will only be prepared after development consent is granted.

While I appreciate that detailed management plans are standard practice, I do not believe it is appropriate to defer so many important matters until after approval for a project of this scale located immediately opposite existing homes.

Residents are effectively being asked to accept that construction impacts will be appropriately managed without knowing precisely how construction traffic, heavy vehicle movements, noise, dust, working hours and access arrangements will operate in practice.

Given the length of the construction program and the close proximity of neighbouring homes, I respectfully submit that greater certainty should be provided before any consent is granted.

### **Conclusion on construction impacts**

I accept that construction impacts cannot be completely avoided. However, given the scale of the proposal, its immediate proximity to existing homes and the extended construction period, I do not

believe the applicant has adequately demonstrated that these impacts can be managed without causing significant disruption to neighbouring residents.

As one of the households located directly opposite the development, my family-including three professionals who regularly work from home and my elderly mother who spends much of each day at the front of our home - will experience these impacts continuously for around 30 months. I respectfully request that the Department give particular consideration to the practical impacts on the residents most directly affected and require greater certainty regarding construction management before determining the application.

#### **4. Bushfire Risk and Emergency Evacuation**

Bushfire is another issue that concerns me, particularly because my own property is partly mapped as bushfire prone land and I would be directly affected by any emergency involving the surrounding area (Photograph 7).

After reading the applicant's Bushfire Assessment, I was surprised that it simply concludes that the site is not mapped as Bush Fire Prone Land and therefore a bushfire assessment is not required.

However, my understanding is that Planning for Bush Fire Protection 2019 also requires consideration where a development may be exposed to bushfire risk and is referred to the NSW Rural Fire Service. Given the site's proximity to Category 1 vegetation and the nature of this proposal, I do not understand why the assessment stops at confirming the site is not mapped as bushfire prone land without considering whether a more detailed assessment is needed.

This is particularly important because the proposal includes both a Residential Aged Care Facility and Independent Living Units. Many future residents are likely to be elderly, have reduced mobility or require assistance in an emergency. I believe developments accommodating vulnerable residents should be assessed to a higher standard for emergency planning and evacuation.

I am also concerned about how an evacuation would actually work.

College Crescent is effectively a single local street for many residents. In a bushfire emergency, existing residents, future RACF and ILU residents, staff, visitors, ambulances, evacuation buses and NSW Rural Fire Service vehicles could all be trying to use the same road at the same time. From my experience living here, the street already becomes congested during busy periods, and I have difficulty understanding how such an evacuation could be managed safely without a detailed assessment.

For these reasons, I respectfully request that the Department:

- refer the proposal to the NSW Rural Fire Service for advice on bushfire risk and emergency evacuation;
- require a Planning for Bush Fire Protection 2019 compliant Bushfire Assessment;
- require the applicant to obtain any necessary Bush Fire Safety Authority before any approval is granted; and

- require a detailed evacuation assessment that considers not only future RACF and ILU residents, but also staff, visitors and the existing residents of College Crescent who would be sharing the same evacuation route.

I am concerned that these issues have not yet been properly assessed. Given the vulnerability of future residents and the existing constraints of College Crescent, I believe independent advice from the NSW Rural Fire Service should be obtained before the application is determined.

## 5. Community Response

I would also like the Department to be aware of the significant level of community concern regarding this proposal.

A community petition established in response to the proposal has attracted more than 570 signatures from residents and members of the local community (Photograph 8). The petition was originally created when the proposal included a nine-storey building, and while the proposal has since been amended to eight storeys, many of the concerns raised by the community remain relevant. The concerns most frequently raised include increased traffic, pedestrian safety, the scale of the development, impacts on neighbouring homes, and the cumulative effect on the character and amenity of College Crescent.

I appreciate that planning decisions must be based on planning merit rather than the number of objections received. However, I believe the level of community response demonstrates that these concerns are genuine, widespread and deserving of careful consideration. It also reinforces the importance of ensuring that the proposal has been fully assessed before any decision is made.

The petition can be viewed at: <https://www.change.org/p/stop-overdevelopment-at-19-25-college-crescent-st-ives-9-storeys-is-not-st-ives>

Thank you for the opportunity to make this submission. I would be pleased to provide further information or to meet with departmental officers on site should that assist the assessment.

Yours faithfully,

Chunru Lu

22 College Crescent, St Ives NSW 2075

## Appendix A - Photographs

*Note: Video 1, Video 2 and Video 3 referred to in this submission are not embedded in this document, as Microsoft Word does not support embedding playable video files. These videos will be uploaded separately, together with this submission.*

**Photograph 1:** College Crescent during school drop-off or pick-up, showing queued vehicles, parked vehicles and pedestrians. (*referred to in Section 1*). The car stopped in my driveway with its engine running to wait for a pickup. Photograph taken from the veranda of my property on **31 July 2026 at 3:04pm**



**Photograph 2:** On-street parking along College Crescent on a typical weekday. (*referred to in Section 1.*)  
Photograph taken from the corner of my property near the Chabad entrance on **30 July 2026 at 9:45 am**



**Photograph 3:** The driveways of 20 and 22 College Crescent and the Chabad entrance opposite. (*referred to in Section 1*)



**Photograph 4:** The outlook from 22 College Crescent across the Masada College oval, showing the open frontage and absence of screening. (*referred to in Section 2.*)



**Photograph 5a:** The front veranda outlook used daily by my mother, showing her view across the Masada College oval. (*referred to in Sections 2 and 3.*)



**Photograph 5b:** The outlook from my mother's bedroom facing the proposed development. (*referred to in Sections 2 and 3.*)



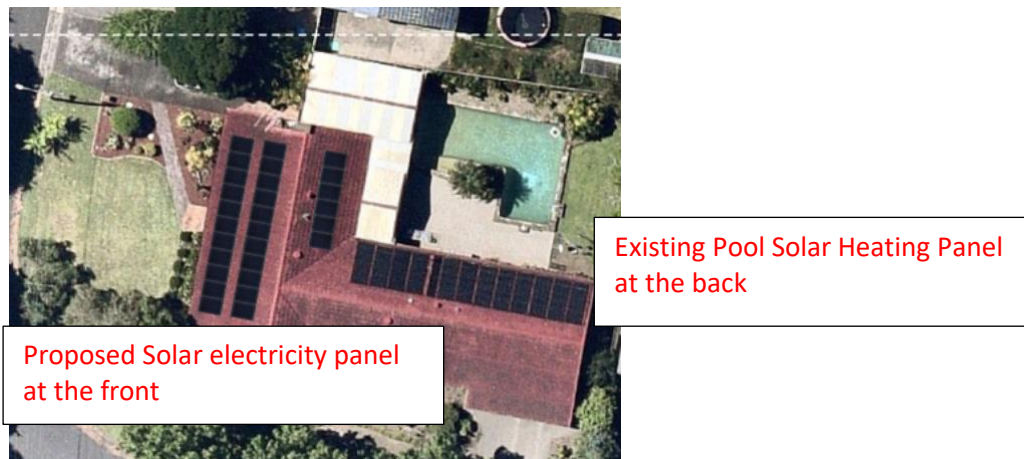
**Photograph 5c:** A closer view from my mother's bedroom window showing the direct sightline to College Crescent and the development site. *(referred to in Sections 2 and 3.)*



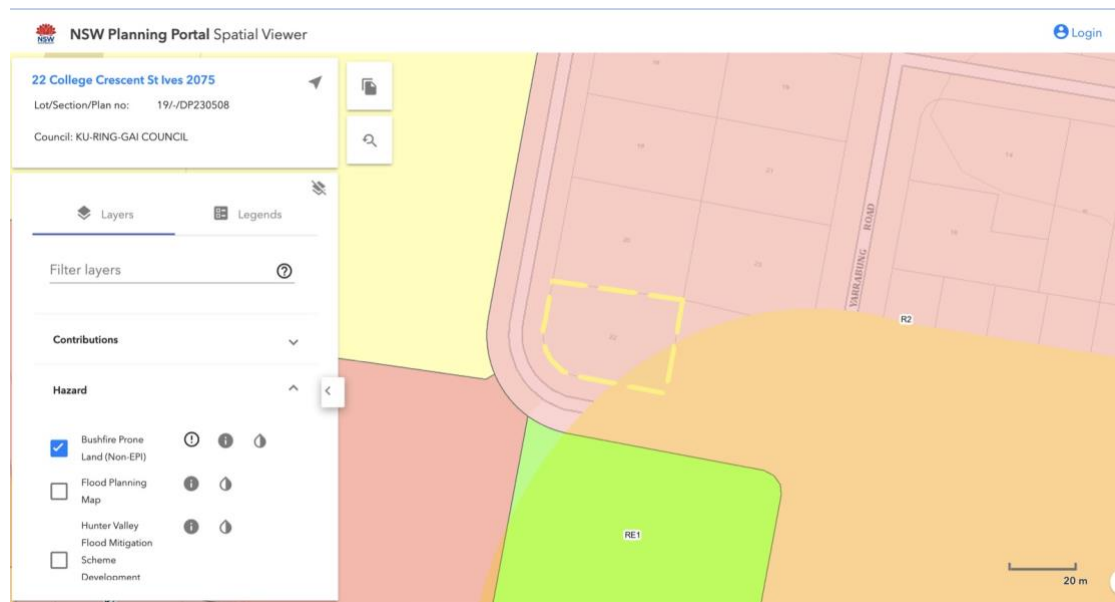
**Photograph 5d:** A view from the front lounge used daily by my mother, showing the outlook toward the proposed development. *(referred to in Sections 2 and 3.)*



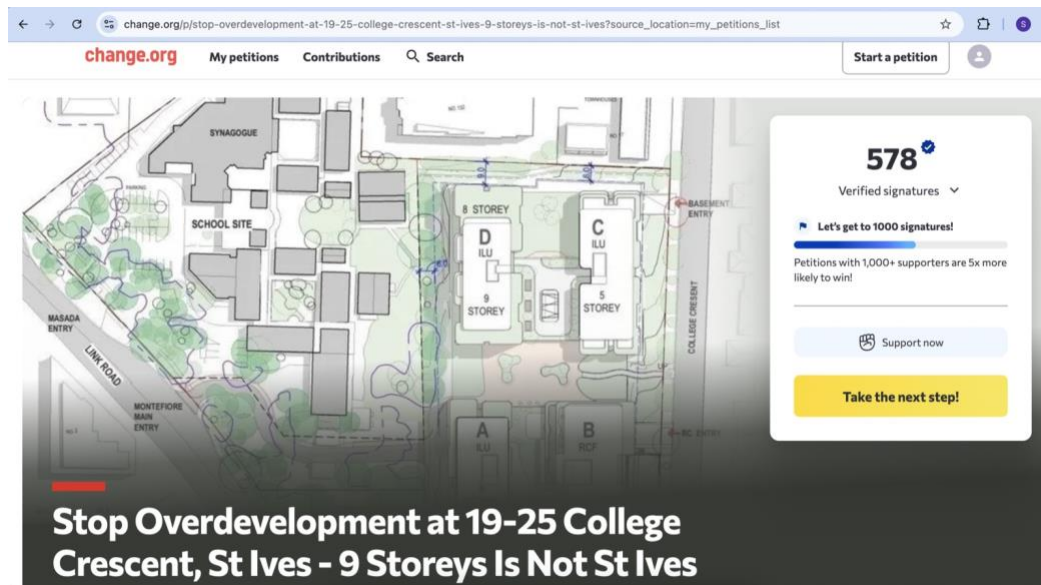
**Photograph 6:** The roof of 22 College Crescent, showing the existing solar pool heating and the remaining roof plane facing the site. (*referred to in Section 2.*)



**Photograph 7:** Bush Fire Prone Land map extract showing the mapping over my property and the vegetation near the site. (*referred to in Section 4.*)



**Photograph 8:** Screenshot of the community petition showing the signature count and the date of the screenshot. (referred to in Section 5.)



**Photograph 9:** Aerial photograph or Planning Portal extract showing 22 College Crescent relative to the site and the proposed RACF College Crescent driveway. (referred to in Sections 1 and 2.)

