

Submission - SSD – 85869467 Concept and Stage 1 – ANZAC Village Seniors Housing

To whom it may concern,

The following comments are provided for consideration and to assist the Department in the assessment and determination of the **SSD – 85869467 Concept and Stage 1 – ANZAC Village Seniors Housing**

My family (including an existing resident of RSL Lifecare) and I strongly object to the SSD – 85869467 for the following reasons:

- **Misleading Stakeholder Engagement and limited Exhibition period**

Main stakeholders in this process are the extremely vulnerable existing residents of RSL Lifecare, many returned vets, former public servants and most are elderly some more than 100 years old. All of the residents have some type of mental and/or physical disabilities such as mobility issues, deafness, blindness, PTSD, anxiety, depression, dementia etc. They are at a terrible technological disadvantage when it come to advocating for themselves (many have no family support) and I feel that RSL Lifecare has been extremely misleading in their approach to engagement with this important group of stakeholders.

Giving elderly and disabled people 2 weeks to respond to an EIS Report and over 50 technical reports, with no support, is ridiculous and discriminatory and I propose for fairness the exhibition period of this SSD projects should be extend to at least a month so that residents and surrounding community have a chance to prepare a submission.

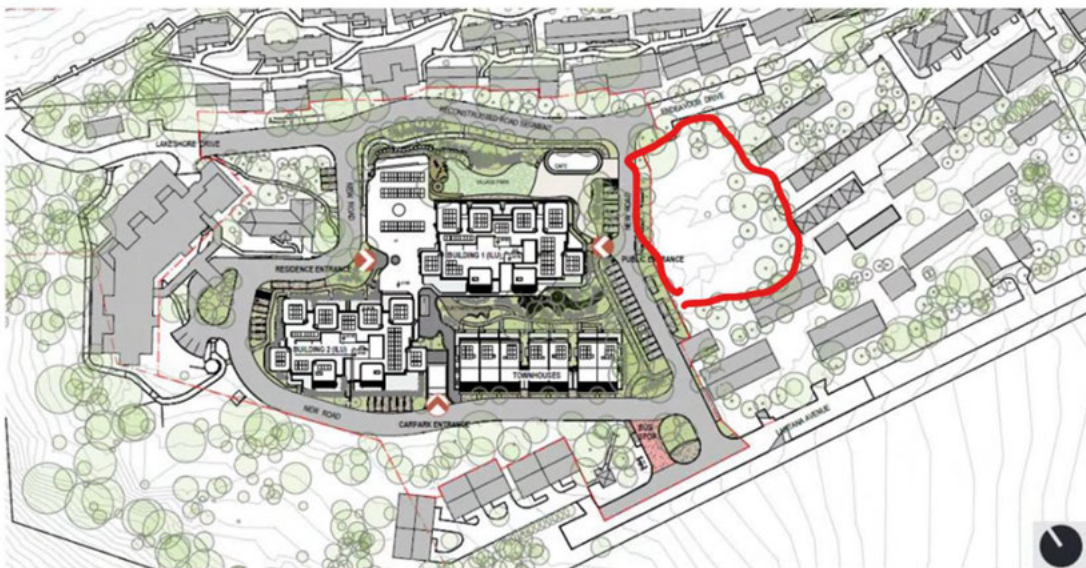
Most of the detail of the Stage 1 works have not been shared with the residents up until this point. It is only now residents and concerned community realise the actual scale of this proposal. To now be offered this short period to trawl through the EIS and associated appendices including over 50 very technical documents is cruel. Some very important components of the Concept Plan and Stage 1 works have not been included in summaries and have been well hidden a few documents. This is totally unfair treatment of these important members of our community.

- **Misleading and inaccurate details in the submission**

The EIS Main report is very misleading in terms of impacts of Stage 1 Works - outlined on page 15 as *'Demolition and site preparation works, including the removal of up to 131 trees'* with no mention of Stage 1A demolition works up front. This component of the work will have the most impact on existing residents as it includes demolition of buildings and temporary use of the site (no details provided in any document about this) during construction period in the area marked as Stage 2. The residents in Stage 2 area have been led to believe up to this point that the Stage 1 works will not impact them until 2029/2023. This is extremely misleading and distressing for the residents.

The EIS highlights the community engagement and stakeholder consultation that has occurred – which also neglected to identify the Stage 1A works included in this DA. Section 1.4.2 Stage 1 works does not reference the Stage 1A component of the DA. The EIS includes a map (below) which does not reflect the Stage 1A component of the DA which will occur in the area marked as Stage 2.

Section 3.1.2 (Figure 23) – Stage 1 Component also neglects to identify the Stage 1A demolition component of the DA which I have highlighted red. The area in this Figure 23 - Proposed Stage 1 and development (site plan) copied below show the area that will be subject to demolition as part of Stage 1 as a green open space. No indication that it will be a demolition and construction zone from day 1.



This is extremely misleading to the public and should be rectified and re-exhibited accordingly so that residents have a clear understanding of all of the components of the Stage 1 works. The misleading information is scattered through all of the Appendices and was used as collateral for engagement and consultation (and probably the request for SEARs) which is completely unacceptable and contrary to the objects of the EP & A Act.

EIS Section 3.2 Key Project Information – 3.2.1 Project Details – Table 4 - Key Project Details – also neglects to include the demolition works that will form part of the Stage 1 works (Stage 1A is in Stage 2 area). Section 3.4.2.1 Demolition Works – also neglects to specifically identify Stage 1A as part of Stage 1 DA, instead Figure 25, conveniently and misleadingly shows all buildings to be demolished under the concept plan not just the ones occurring in Stage 1.

The more accurate maps are not included in this report until at least half way through and seem to be hidden or missing from the Appendices except for Appendix M Noise

Impact Assessment and SSDA Acoustic Report. This report highlights the resident in the Stage 2 areas as being most at risk during the Stage 1 demolition works process, yet it is hardly mentioned anywhere else.

See example of map shown in EIS (and most appendices including all of the Consultation and engagement collateral) compared to map shown in Appendix M.

Below map shown in EIS and all Stakeholder collateral

Figure 1 Proposed Staging Plan – Image Source: RSL LifeCare



This plan is very confusing and misleading for the general public to read / understand as it shows outlines of future buildings not existing buildings.

It identifies Stage 1 occurring to the west of the main entrance off Lantana Avenue and fails to show the Stage 1A demolition component which will directly impact the existing residents in and around Stage 2 as it will occur in the North West corner of the Stage 2 area (see below map extracted from Appendix M that shows the extent of impact that Stage 1 will have).

Appendix M 2.4.2 and Figure 5 clearly show the Stage 2 area being directly impacted by demolition of buildings and the use of the area as a construction set down area (Page 13 Appendix M - *The overlapping area with Stage 2 will consist of demolition of existing buildings only and construction set down area*).

The existing residents in the area highlighted as R2 (Nearest residential Receivers) were not informed about this stage of the development (as it has never been included in an

engagement collateral) and may not have any idea about this component of the Stage 1 works as the map is difficult to find in the EIS main report and Appendix M.

See below for only map found in Appendix M that highlights residents to be impacted the most – nearest noise sensitive receivers.

2.4.2 Stage 1 location and nearest noise sensitive receivers

Figure 5 below presents an aerial photograph of Stage 1 location and nearest noise sensitive receivers. The overlapping area with Stage 2 will consist of demolition of existing buildings only and construction set down area.

Figure 5 Stage 1 Nearest Noise Sensitive Receivers



- **Significant impact of proposed Stage 1 works on the existing residents in close proximity to the development – noise, dust, vibrations etc**

The Construction Noise and Vibration Management Plan in Chapter 8 of Appendix M outlines the construction noise and vibration impacts associated with the Stage 1 works.

The Construction Noise assessment *highlights 'that construction noise is predicted to exceed 'highly noise-affected' levels in many instances during standard hours for residential receivers when noise events are within 10 metres of the receiver.'* The

vulnerable residents in the area identified as R2 of the above plan are currently living well within 10 metres of the boundary of the demolition and temporary holding area site, and will therefore be severely impacted by the Stage 1 works during demolition and construction. (see map above 2.4.2 Appendix M). These residents have been told by RSL LifeCare, numerous times, even after the EIS has been on exhibition, that they will not be impacted until 2029/2030 when they will start to consider their relocation plans.

Mitigation measures identified to reduce impact will also have an impact on the residents particularly where north facing areas will be likely subjected to dust screens and noise barriers (as per 8.4.2.3 - *A solid barrier could be installed around the perimeter of the construction site to control construction noise.*) These devices will detrimentally impact existing vulnerable residents' with construction dust, asbestos, wood chips, large vehicles, traffic access to sunlight, visual outlook and outdoor areas. This area is a thoroughfare for seniors with walkers, canes, and scooters, as well as clothes lines where laundry will now be compromised.

These impacts are not acceptable and if they can not be adequately dealt with, RSL LifeCare should immediately acknowledge these impacts and work with these residents individually as a priority for relocation before any work commences. The plans identify stage 1, and this area as stage 2, yet in carefully concealed small print state stage 1a, which respectfully, as the site sheds, and operations areas are the first to be established, this area will be the first set up, therefore begins in stage 1, and will be the main site for fifteen years. The operations managers site cannot be stage specific, as it begins operation during pre-construction, and remains for the duration of the project, in this case fifteen years.

To reiterate, prior to stage 1 commencement, this site, currently located on stage 2, yet in small print called stage 1a will be the first site demolished, filled with site sheds, materials, machinery, vehicles, radios, and construction workers during the entire fifteen year process will report to this site. Residents in the Lawrie Goss Houses are less than 10m from the mitigation hoarding.

Vibration impacts during demolition and construction are highlighted as having likely impacts on the same residents as identified in Section 8.3.2 - *The vibration buffer distances in the section above and the distance to the nearest sensitive receiver locations (as close as 10 metres to the nearest residential locations) indicate the potential for excavation work to result in adverse vibration impacts at some off-site receivers.*

- **Unnecessary tree removal and bushland clearing**

The report identifies significant management controls that will need to be implemented to ensure residents are not impacted, however, as identified above, it would be much more constructive and caring to allow the most impacted residents to relocate to an appropriate location prior to any construction works beginning.

We object to the complete inappropriate Overdevelopment of the site in the wrong location (top of ridge in extremely bushfire prone area that is steeply sloped) which will require significant removal of trees and bushland to protect it in the future.

Section 3.4.2.2 Tree removal identifies the drivers of need to remove 478 trees on the site including 172 medium value trees and 126 high value trees as:

- The delivery of expanded road reserves to meet RFS guidelines for emergency vehicles.
- The creation of new APZs and bushfire hazard reduction works.
- The need to accommodate benching to facilitate new streets, building footprints, footpaths and level open spaces.

Unfortunately, this section of the report fails to mention that the need to remove most of these trees is to satisfy requirements for the scale of the new buildings, as the site is an area highlighted and well known as highly bushfire prone.

Section 3.4.2.3 Creation of new Asset Protection Zones – as above, would not be necessary to this scale if the development proposed for the site was reduced in scale and located in a more appropriate place.

If the development was reduced in scale and moved to a more appropriate location on the site (not at the top of a ridge adjoining bushland at the end of a no through road) this tree destruction would not be necessary to protect existing and future residents.

According to Page 81 of the EIS - The proposed development relies upon both existing approved APZs and proposed new APZs, which results in new APZ siting in a small portion of the C2 zone. Development for the purpose of roads is permitted with consent in the C2 zone. Beyond roads, there are no built form works proposed in this area, however tree removal and pruning are required to create the APZ.

I object to the scale of the proposed development and the location of the highest density buildings (Stage 1 and 2) close to the highest bushfire risk areas. If this overdevelopment was reduced and relocated there would be no need for such a large Asset Protection Zone which will result in significant unnecessary destruction of trees and bushland in a conservation area off site.

- **Inappropriate site access via Lantana Avenue poses emergency access risks**

We also have concerns that the main road into and out of the site closest to the Stage 1 works (Lantana Avenue in a no through road) is not wide enough to be used for emergency access in a bushfire emergency. The internal roads of the site are certainly not up to standard and the site, sitting at the top of a ridge, surrounded by bushland would be very difficult to evacuate during an emergency. This poses a significant risk to existing residents during the construction phase and future residents. In the most recent bush fires, emergency vehicles were unable to access the Village due to the hill up Veterans Parade, and where delayed past shops and school zones trying to navigate the hills through Collaroy, and Wheeler Heights. Not to mention there were not adequate staff to assist residents to the designated safe areas. If they couldn't manage the current number of residents, there is no way they will be able to manage quadruple the amount of residents safely in an emergency situation.

- **Scale of proposed works and overdevelopment of the site**

In addition to the points raised above, the scale of the development proposed as part of Stage 1 and 2 of the Concept Plan is completely contrary to the Warringah DCP Development Control Plans - Warringah Development Control Plan 2011. As highlighted in Appendix B

– Statutory Compliance Table – although the development control plans are not a matter for consideration in the assessment of SSDAs by virtue of Clause 2.10 of the Planning Systems SEPP. Notwithstanding, the DCP does include a precinct-specific control, which has been considered to guide design development, identified under control ‘F3 SP1 Special Activities (War Veterans Village, Narrabeen)’

Which states that - the scale and height of development along Veterans Parade and Lantana Avenue will be consistent with the adjacent established residential development and buildings are to address the street. New buildings will be grouped in areas that will minimise disturbance of vegetation and landforms. Bushfire hazard reduction measures and stormwater detention required as a result of development will be contained within the site.

The residential building currently along Lantana Avenue are detached residential buildings of 2 storey maximum. The proposed development in Stage 2 is 4-7 storeys which is more than double to triple+ the height of buildings directly opposite Stage 2. Again, this could be rectified if scale of the buildings is reduced or larger scale buildings are relocated to a more appropriate locations on the site.

Again note the issues of bush fire emergency. Also the mention of storm water and waste management which risks polluting and destroying the indigenous lands and habitat of Narrabeen Lakes.

The plan shows an area off the subject site that will be used as an asset protection zone which is also contrary to this DCP control.

- **The use of part of the Stage 2 area for demolition and temporary construction purpose**

Section 3.5 Stage 1 Detailed Works – 3.5.1 Demolition and Site Preparation Works – 3.5.1.1 page 65 (and Figure 35 and 36 copied below) is the first indication in the EIS that the Stage 1 works will directly impact the land identified as Stage 2 and Stage 5 noting that the Detailed consent for demolition is also sought for:

The Wirraway and Tobruk Aged Care facilities, which partly extends into the Stage 2 area under the Concept masterplan. These facilities are vacant and will operate as a temporary construction staging and storage area for Stage 1

- *The Catalina and Milne Bay Aged Care Facilities, which are currently vacant within the Stage 5 area of the Concept masterplan.*

- *Associated existing internal roads infrastructure and the Lantana site entry point to facilitate upgrading.*

- *The current Lakeshore Drive entry from Lantana Avenue and associated bus stop.*

In addition to the fact that this detail seems to be hidden in the document and has not been openly communicated – the use of the area identified as Stage 1A (see map below) as a temporary construction staging and storage area for Stage 1 is another significant

reason why the existing residents in the Stage 2 have been misled to believe the Stage 1 works will not impact them. As mentioned above construction staging, storage areas, and side sheds are established prior to construction, and remain for the duration of a project. They can't be called stage 1a in small print under stage 2.

This issue needs to be rectified and RSL LifeCare need to help these residents understand the impacts and their rights in terms of making a submission to the plan and in ensuring they are prioritised for relocation prior to any works being undertaken.

I have been unable to find any reference to the temporary use of the Stage 1A area for staging and storage or the roadworks associated with Lantana Avenue and entry point in any of the appendices, therefore I believe the future use and works (whatever they maybe) have not been considered in the EIS. This should be rectified / re exhibited before any determination of this proposal.



Figure 35 Overview of proposed Stage 1 demolition across the site

Source: AJC

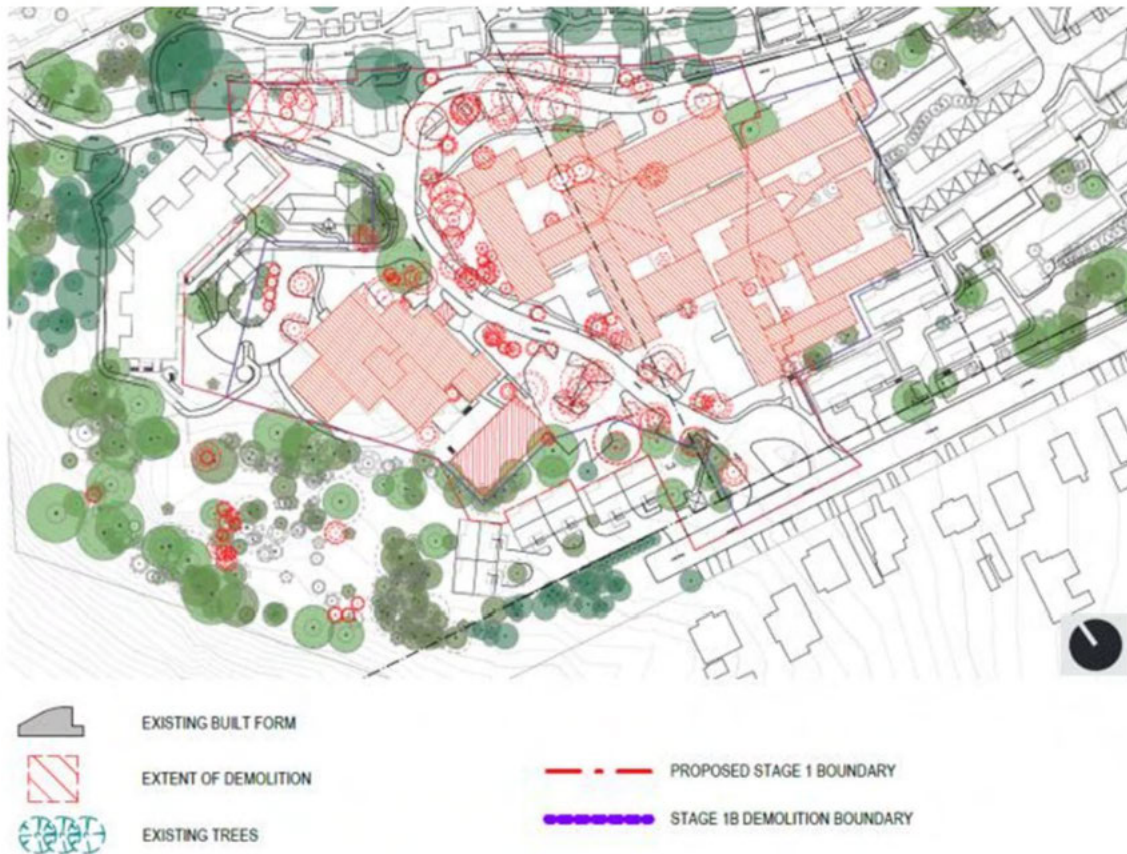


Figure 36 *Proposed demolition – Stage 1A*

Source: AJC

- **Misleading information contained in the Appendix M - Social Impact Assessment:**

This document is based on out of date and misleading information that does not include Stage 1A demolition impacts. It highlights that surrounding residents inside the village will be at highest risk to the impacts of the Stage 1 works.

This documents assumes risks associated with construction staging impacts can be effectively mitigated through *early planning (which did not identify accurate demolition timeframe and area of impact)*, *communication strategies (which have used collateral that was difficult to read, incorrect and misleading)* and *careful phasing (which has neglected to recognise the significant impacts of demolition of Stage 1A on the surrounding residents will occur pre and during Stage 1 and remain in place for the fifteen year duration)*.

In neglecting to identify the true nature of the development the Social Impact Assessment totally under represents the significant impacts the existing residents will be subject to during the demolition and construction phase.

- **Misleading information contained in Section 5 of the EIS - Stakeholder Engagement and the Appendix E Engagement Outcomes report**

As much as RSL Lifecare may claim that they have consulted and engaged the existing residents (and other) on the Concept and Stage 1 works – this is clearly incorrect, my personal experience has unfortunately declined from trusting representatives, to experiencing lies, lack of transparency, deception, and extreme lack of duty of care for seniors, vets and the most vulnerable.

Looking through the Appendix E Engagement Outcomes Report, the plans and maps used as collateral for the consultation and engagement exercises were incorrect, misleading and confusing to the residents. This is extremely incompetent given the vulnerable nature of the residents who trust that RSL LifeCare is looking after their best interests.

I have been told by existing residents that they were shown vague maps and artist illustrations and renders of future development and the real impacts of the proposal were not identified until the EIS went on exhibition. On occasion I had asked them to send images, or had seen the images first hand, and was able to confirm the inaccuracies, and omissions. After a year of falsehoods, the impacted residents are feeling misled and anxious about their future which is extremely distressing for them and is causing angst and impacting their health and quality of life. Personally, my mother has declined from healthy, fit vibrant 86yo to two near nervous breakdowns resulting hospitalisations, and is suffering anorexia and depression, as a result of this experience. Maps showing future development instead of current housing are not very useful to anyone when trying to engage on impacts on individual residents.

Section 5.2 of the EIS outlines the various Stakeholders views that have been identified through several engagement processes including with the State Design Review panel, Department of Planning Housing and Infrastructure and Northern Beaches Council. As the material presented at these meetings is not available for scrutiny, I can only assume the full details of Stage 1 Works were not articulated as part of this process. Again this is misrepresenting the proposal and reduces my confidence that these meetings were transparent and thorough about the details.

- **Proposed built form and density and impacts on surrounding residents**

Section 6.1 Key Issues – 6.1.1 – Built Form – 6.1.1.1 Density of the EIS includes headings such as *‘Relationship to streetscape and surrounds’* which highlights the *site is located adjacent to established low density residential areas, with low scale, detached dwellings being the dominant development typology which surrounds the site to the east and south.* Despite this, the density of the proposed Stage 2 is up to triple the height (4-7 storeys) proposed directly opposite this housing. This is completely inappropriate for the site.

Section 6.1.1.2 Positioning and Scale of Built Form identifies that: *The proposed built form has been positioned in areas of the site of which contain existing form that has been identified by RSL LifeCare as in need of renewal.* This section makes no reference to the appropriateness of the overall density in relation to the site as a whole, which sits in a low density suburb on the fringe of a bushland area.

Thank you for considering all of our concerns in your assessment of the SSD. Please feel free to contact us if you have any questions.

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