

Appendix A – Feedback Submissions



Feedback Submission 1



16 May 2025

Department of Planning, Housing and Infrastructure (DPHI)

12 Darcy Steet, Sydney

NSW, 2150

RE: Formal Submission (Objection) – State Significant Development Application No. SSD-85869467

ANZAC Village Seniors Housing – Concept Plan & Stage 1 Development, Wheeler Heights NSW

This submission is made by Willowtree Planning on behalf of the owners and occupants (Chris and Emma Wilson) of 19a Lantana Avenue, Wheeler Heights NSW 2097, in response to the above-referenced State Significant Development (SSD) application for the ANZAC Village Seniors Housing Concept Plan and Stage 1 development.

The submitters are not opposed to seniors housing or to the broader intensification of this site and recognise the important purpose served by RSL LifeCare and acknowledge the genuine community need for quality aged care accommodation. However, we hold significant objections to the proposed bulk, scale, height, and character of the development as currently designed, and to critical deficiencies in the supporting technical studies that accompany the application.

We respectfully request that the Department of Planning, Housing and Infrastructure (DPHI) consider the concerns raised below and impose appropriate conditions, or request that the applicant revise the scheme prior to any determination.

1. Height, Bulk and Character – Concept Approval

While there is no applicable height or floor space ratio (FSR) control for this site under the Warringah Local Environmental Plan, the absence of a numerical control does not render any scale of development appropriate. The proposed massing across Stages 1, 2, 3 and 4 is well beyond what could reasonably be considered compatible with the prevailing low-density residential character of Lantana Avenue, Wheeler Heights, Narrabeen, and Collaroy Plateau.

For context, the NSW Government's Low and Mid-Rise Housing reforms — which represent the State's most permissive recent uplift for residential zones — establish the following non-discretionary standards in inner LMR areas (within 400 metres of a nominated station or centre):

- Maximum FSR: 2.2:1
- Maximum height: 24 m (shop top housing) or 22 m (residential flat buildings)
- Maximum storeys: 6

The proposal seeks heights and massing that exceed these thresholds in a location that is not zoned for residential flat buildings, is not situated in an R1 or R2 zone, and is not proximate to a nominated station or centre. The scale proposed is more consistent with a commercial centre or high-density transit corridor than the established suburban context of Wheeler Heights.

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We note that an Expression of Interest submitted to the Housing Delivery Authority (HDA) was previously refused for this project on grounds of bushfire risk, emergency evacuation, bulk and scale, streetscape issues, visual impacts, view loss, landslip risk, local traffic impacts and heritage sensitivity. These concerns remain unresolved and compound the case for a substantially reduced scheme. A historical assessment of all past Refusals tied to the land are provided in latter sections of this submission for DPHIs reference.

Furthermore, the existing road network is already operating at capacity. Emergency evacuation planning for both the existing Anzac Village residents and the surrounding community has not been adequately addressed. The density must be reduced to a level consistent with safe and demonstrated emergency egress. In addition, car parking on Lantana Avenue has recently been changed (2024) to only permit parking on the southern side of the street to accommodate the existing public bus to fit down the street. Since then limited on street spaces exists on the southern side of Lantana Avenue and the on-street parking available is non-existent seven (7) days per week due to visitors of the existing Anzac village parking on the street for days and days at a time. Existing residents of Lantana Avenue and their visitors are having to park on the nature strip, and the Council have been fining people to no end since the on-street parking controls to the northern side of Lantana Avenue were introduced. Further any construction works on site must allow for adequate trades to park on site and not on the over exhausted and completely congested Lantana Avenue.

Our preferred position on height and storey limits is as follows:

- Stages 1, 3 and 4: Maximum four (4) storeys, capped at RL 72 including plant and services;
- Stage 2 (Lantana Avenue interface): Maximum 2.5 storeys to the Lantana Avenue frontage; maximum RL 70 including plant for the ILUS building behind.

Rationale based on impacts of the proposed development above the reasonable storeys and height limits suggested are further discussed in latter sections of this objection with particular consideration given to 19a Lantana Avenue where iconic view impacts of Narrabeen Lake, the entrance to the Pittwater itself / Lion Island and the majestic district views will be removed should the development maintain its proposed conceptual heights and massing and nominated RLS.

2. Impact of Stages 3 and 4 on 19a Lantana Avenue

The Concept Plan proposes the following heights for Stages 3 and 4:

- Stage 3: 8 storeys plus plant, RL 83.25
- Stage 4: 6 storeys plus plant, RL 75.30

These heights are excessive and will result in a complete and irreversible loss of the district and iconic views of the entrance to the Pittwater (Lion Island – Figure 1 below) enjoyed from the property at 19a Lantana Avenue and other residences along the upper sections of Lantana Avenue. No view impact assessment has been undertaken from our property or from other affected private dwellings along Lantana Avenue o Veterans Parade. Very concerning for the industry that such a lack of regard for making and sealing an SSDA package has passed Test of Adequacy in its current form and has even made it to exhibition.

A maximum of four (4) storeys and a maximum RL of 72 including plant and services is considered appropriate for Stages 3 and 4. This height limit would reduce the visible bulk and scale from both

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public and private vantage points **(Of which there are many more than discussed in the Visual Impact Report)** and is more aligned with the character and topography of the locality. At this height, the built form would be more likely to remain screened below the canopy of the significant mature trees throughout the Anzac Village landholding. See figure 2 below.



Figure 1 – Lion Island and Entrance to the Pittwater from 19A Lantana Avenue.





Figure – 1A District and Lake View



Figure 2 – Tree Canopy images of from Lanata Avenue – Red line shows Maximum height that may be considered reasonable in the low-density residential character of the area.

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Action / Request: *The applicant must prepare a rigorous View Impact Assessment (VIA) from 19a Lantana Avenue and from all affected properties along Lantana Avenue. The VIA must be prepared by a suitably qualified professional, include accurate survey data and sight-line modelling, and demonstrate the view impacts from both the lower and upper sections of Lantana Avenue. The Department should not accept the current VIA, which is demonstrably insufficient and has been prepared carelessly.*

3. Stage 1 – Height and Streetscape Impact on Lantana Avenue

Stage 1 is proposed to reach RL 67.0 plus plant. This height will be dramatically visible from Lantana Avenue and will be entirely inconsistent with the desired character and built form context of this low-density residential streetscape.

We submit that the height of Stage 1 should be reduced to below RL 62 including plant, or at a minimum to a level that ensures the built form remains screened below the canopy of the existing mature trees in this location. This would ensure that the increased density does not visually intrude upon the established character of Lantana Avenue.

The Visual Impact Assessment submitted with the application is inadequate. It does not appear to have been prepared by a person with relevant credentials, and it does not accurately represent the view impacts from all dwellings along Lantana Avenue from the crest to the lower end of the street. A detailed, survey-accurate streetscape analysis referenced to Australian Height Datum (AHD) must be prepared before this application can be properly assessed by DPHI.

Action / Request: A comprehensive streetscape character analysis must be prepared along the full extent of Lantana Avenue. The analysis must be survey-accurate, reference AHD levels, demonstrate the relationship between the proposed built form and the existing mature tree canopy that are to be retained, and show how the built form responds to the natural topography stepping down with the street. The analysis must also address the locality's prevailing Character Statement. Until this analysis is provided, the application should not be supported nor determined.





Figure 3 - Veterans parade tree lined streetscape



Figure 3A – Lantana tree lined streetscape

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4. Stage 2 – Lantana Avenue Interface and ILUS Building

Stage 2 proposes terrace dwellings of up to four (4) storeys to Lantana Avenue, with an Independent Living Units (ILUS) building of 7 storeys plus plant behind, proposed to reach approximately RL 74.25 plus plant.

We submit that:

- The terrace dwellings to Lantana Avenue should be limited to a maximum of three (3) storeys. The site levels for the terrace buildings are approximately half a storey below the adjacent street level, meaning a three-storey building at this location would present as approximately two (2) storeys from the street — a scale far more sympathetic to the existing built form context.
- The ILUS building behind the terraces should be capped at a maximum approx. RL of 70 including plant and services and should not exceed 5 storeys subject to the outcomes of a detailed, survey-accurate streetscape analysis.

The current Stage 2 heights would be clearly visible from Lantana Avenue and would not follow the established pattern of built form stepping down with the natural topography from the crest to the lower end of the street. A no-view-impact assessment from 19a Lantana Avenue has not been undertaken for Stage 2.

Existing buildings close to the Stage 1 location are of an appropriate height and massing as depicted in figure 4 and 4A below.



Figure 4 - Existing 6 story building on site in close proximity to proposed staged 1 and below existing tree canopy.





Figure 4A – Existing view from 19A Lantana Avenue – note top of 6 storey building just protrudes in the left of photo and below the tree canopy.

Action / Request: A proper VIA and streetscape character analysis must be prepared for Stage 2, inclusive of view impact modelling from 19a Lantana Avenue and from all other properties along Lantana Avenue whose owners have developed to the maximum 8.5 metre height limit in order to capture district and lake views. This analysis is critical to a full and transparent assessment of the amenity impacts of Stage 2.

5. Community Consultation – Deficient and Misleading

The 2025 Urbis Community Engagement Outcomes Report relied upon by the applicant is deficient and should be afforded no weight by the Department.

Residents of Lantana Avenue — who are among the most directly affected neighbours — have not been consulted in any meaningful way. No letterbox drop has been conducted along Lantana Avenue. No community information session has been held with local residents. The Urbis report does not comply with DPHI's Community Consultation Guidelines and cannot be relied upon as evidence that the community has been properly informed of or engaged on the proposed development.

A community meeting must be convened with residents of Lantana Avenue and the surrounding streets before any determination of this application, to allow affected residents to understand the proposal and provide informed submissions on the existing and likely future impacts of the development.

Action / Request: DPHI should direct that the Urbis Engagement Outcomes Report be set aside and that genuine community engagement be undertaken in accordance with DPHI's Community Consultation Guidelines. Proper consultation must include direct notification to all

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residents of Lantana Avenue and a community information session before any determination is made.

6. Traffic, Parking and Emergency Access – Lantana Avenue

The current on-street parking arrangements on Lantana Avenue were amended in 2024 to prohibit parking on the northern (Anzac Village) side of the street, in order to allow a 24-hour bus service and general traffic to pass. This change has significantly reduced available on-street parking. Notwithstanding this, visitors to the existing Anzac Village routinely park on Lantana Avenue, placing further pressure on an already constrained street. Figure 5 depicts this a bus and vehicle in conflict. The bus has stopped behind parked cars to wait for the standard vehicle to pass.



Figure 5 – Lantana bus and vehicle conflict

The proposed significant increase in the number of ILUS and associated residents, staff, and visitors will dramatically exacerbate these existing parking and traffic conditions. As RSL own the entire side of the street and have more than ample frontage and space to widen the carriageway it is suggested that DPHI seek for Lantana Avenue to be widened on the northern side and on street parking be reinstated. Figures 5A,5B and 5C depict the space available and illegal parking that occurs regularly.

In addition, Any construction resulting from any approval must also ensure that no construction parking is to occur on Lantana Avenue as it will be near impossible even if they tried.



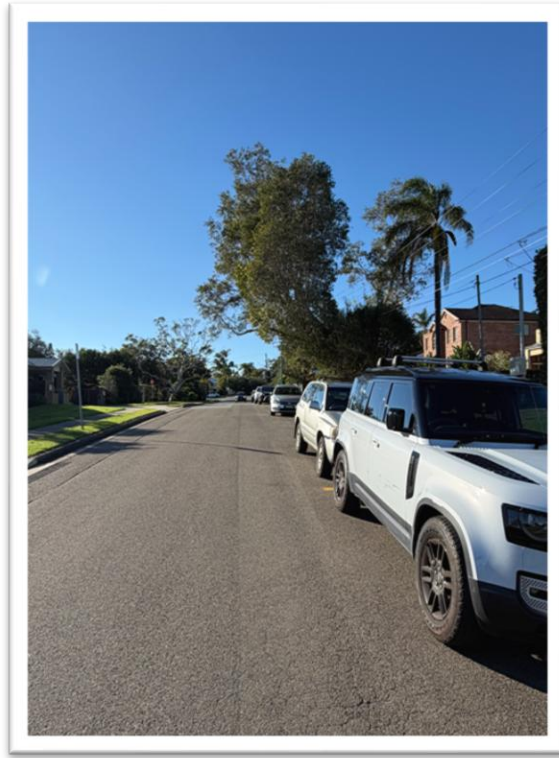
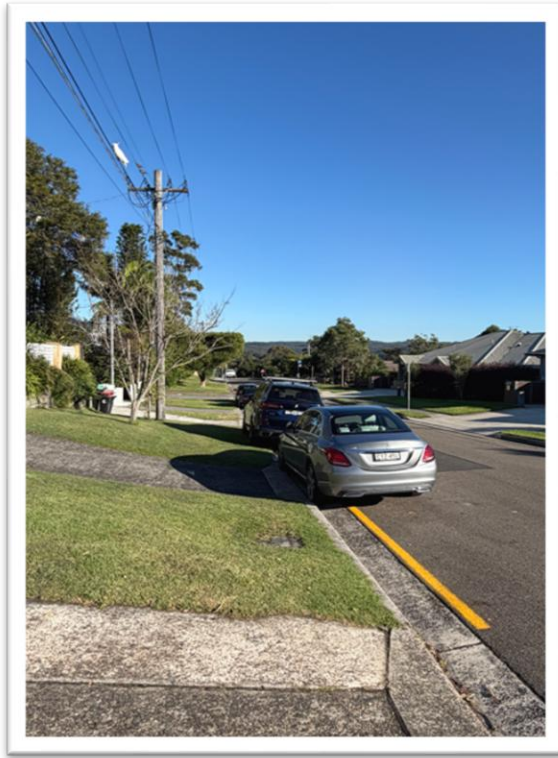


Figure 5A - Illegal parking and no on street parking from residents of the War Vets for days at a time.



Figure 5B - Reinstatement of 24 hours on street parking to the northern side of Lantana Avenue

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Figure 5C - Space for carriageway widening of Lantana on the northern side up and down Lantana Avenue as RSL own the entire side of the street

In addition, the Clause 4.6 variation sought in relation to parking has not adequately considered the site's exceptional size, the significant uplift in ILUS numbers and associated visitors who park on Lantana for days at a time, the feasibility of additional basement levels for visitor overflow, or the existing community dependency on Lantana Avenue for visitor parking.

Emergency evacuation planning for a development of this scale, in a bushfire-affected area with constrained road access, has not been satisfactorily addressed. This is a fundamental concern for the safety of both future residents of the development and the existing community.

Action / Request: *DPHI should direct that: (1) comprehensive traffic surveys and on-street parking audits be undertaken on Lantana Avenue over a minimum two-to-four week survey period; (2) the feasibility of widening Lantana Avenue on the Anzac Village side and reinstating on-street parking on both sides of a widened carriageway be investigated; (3) additional basement parking levels be included in the ILUS buildings to meet visitor parking demand as visitors are generally families visiting their parents in the ILUS and stay for extended periods of time; and (4) the Clause 4.6 variation to parking controls not be supported until proper survey data is available. Finally, a peer review of the final traffic report must be undertaken in respect of local traffic conditions and safety around the Bushfire and emergency evacuation.*

7. Mature Tree Retention and Canopy Screening

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The significant mature trees throughout the Anzac Village landholding provide a critical visual screen between the proposed development and the residential properties on Lantana Avenue and Anzac Avenue. They are a defining element of the locality's leafy character and contribute materially to the amenity of adjacent streets and properties.

Any reduction in the building heights to below the **substantial and heavy set** prevailing tree canopy — as requested in this submission — would preserve the visual integrity of the streetscape and the character of Wheeler Heights, Collaroy Plateau and Narrabeen. The applicant and the Department should ensure that no significant canopy trees are removed as part of any stage of this development without compelling justification, and that replacement planting of equivalent canopy value is secured as a condition of any consent to the same mature scale / RL of those being removed. And we don't want Palm Trees!!!

The streetscape character analysis requested above must specifically address the relationship between the proposed built form and the existing tree canopy, the tree removal proposed and demonstrate that the built form steps down with the topography of the site in a manner consistent with the prevailing character of the locality.

Development Application History — 90 Veterans Parade (Lot 1), Narrabeen

DA number	1990/25
Lodgement date	Not stated in documents provided
Decision date	10 April 1990
Land	Portions 568 and 570, Parish of Manly Cove, Colooli Road, Collaroy Plateau (RSL War Veterans Retirement Village)
Applicant	Downie O'Donnell & Associates, PO Box 345, Miranda NSW 2228
Description	Additions and alterations to convert existing residential building "Kokoda" to a bowling club
Outcome	Refused
Reasons for refusal	<ol style="list-style-type: none"> 1. Pursuant to s.90(1)(b) EP&A Act 1979 — The proposal has not demonstrated by means of a Statement of Environmental Effects that the potential environmental impact of the proposal is satisfactory and that adequate means have been taken to ensure that any adverse environmental impact will be mitigated. 2. Pursuant to s.90(1)(d) and (r) EP&A Act 1979 — The proposal has not demonstrated that the social effect of the development is satisfactory in regard to the proposed loss of residential accommodation for aged or disabled persons and that the proposal is in the public interest.

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Authorised by	R Kay, Chairman Development Unit, Corporate Services Division, Council of the Shire of Warringah (per Mrs R Miller, 10 April 1990)
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DA number	1990/30
Lodgement date	23 January 1990
Decision date	22 March 1990 (notice of refusal issued 23 March 1990)
Land	Portion 569, Parish of Manly Cove, Veterans Parade, Collaroy Plateau
Applicant	RSL Veterans Retirement Villages, PO Box 56, Narrabeen NSW 2101
Description	Erection of a fuel tank
Outcome	Refused
Reasons for refusal	<ol style="list-style-type: none"> 1. Pursuant to s.90(1)(b) EP&A Act 1979 — The proposal has not demonstrated by means of a Statement of Environmental Effects that the potential environmental impact of the proposal is satisfactory and that adequate means have been taken to ensure that any adverse environmental impact will be mitigated. 2. Pursuant to s.90(1)(g) and (r) EP&A Act 1979 — The proposal has not demonstrated that the visual impact of the proposal is satisfactory and that any likely risk of fire or explosion has been adequately prevented.
Authorised by	R Kay, Chairman Development Unit, Corporate Services Division, Council of the Shire of Warringah (22 March 1990)

DA number	1995/266
Lodgement date	Not stated in documents provided
Decision date	17 July 1996
Land	Part Portion 2611, Lantana Avenue, Collaroy Plateau
Applicant	RSL Veterans Retirement Villages, PO Box 56, Narrabeen NSW 2101
Description	Erection of Greenhaven Retirement Village, including 148 x 2 bedroom units, a 46 bed hostel, 54 serviced units and including common facilities, roadworks, landscaping and associated site works

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Outcome	Refused
Reasons for refusal	<ol style="list-style-type: none"> 1. Pursuant to s.90(1)(a) and (c2) EP&A Act 1979 — The proposed development is on land that is, or is part of, critical habitat or is likely to affect threatened species, populations or ecological communities, or their habitats. A Fauna Impact Statement has not been submitted with the application for Council's consideration. 2. Pursuant to s.90(1)(c), (e), (f) and (h) EP&A Act 1979 and Division 5 of Warringah Local Environmental Plan 1985 — The proposed development will have an unacceptable aesthetic impact on the landscape and scenic quality of the locality, and will mar the landscape and landforms of Narrabeen Lagoon. 3. Pursuant to s.90(1)(a) and (b) EP&A Act 1979 — Insufficient details have been given in order to properly assess the extent of excavation and earthworks necessary on the site and the Statement of Environmental Effects accompanying the application is not adequate to enable the proper assessment of the proposal. 4. Pursuant to s.90(1)(m) EP&A Act 1979 — The proposed development will have an unacceptable impact on the existing vegetation on the site and in particular on species of national, regional and local significance. Adequate provision has not been made for landscaping of the site, including the incorporation of the identified significant species. 5. Pursuant to s.90(1)(a) EP&A Act 1979 and State Environmental Planning Policy No. 19 (Bushland in Urban Areas) — The proposed development will disturb bushland reserved for public open space purposes. 6. Pursuant to s.90(1)(b) and (m1) EP&A Act 1979 — The proposed development and its associated work is an unreasonable and inappropriate development, having regard to the potential impacts with the existing natural environment and in particular, will have an adverse impact upon downstream waterways and Narrabeen Lagoon. 7. Pursuant to s.90(1)(r) and (s) EP&A Act 1979 — In the interests of the public and having regard to the importance of the objection by local residents and the circumstances of the case, the development application should be refused. 8. Pursuant to s.90(1)(s) EP&A Act 1979 — Insufficient information has been presented to determine if the development will detrimentally affect a site of Aboriginal significance. 9. Pursuant to s.90(1)(g) EP&A Act 1979 — Insufficient information has been provided with the application to determine if the subject land is liable to flooding.



	10. Pursuant to s.90(1)(e)(f) and (h) EP&A Act 1979 — Given the sensitive environmental nature of the site, the proposed development will result in an overdevelopment of the site.
Authorised by	R Kent, Director Environmental Management, Warringah Council (17 July 1996)

DA number	1997/211
Lodgement date	Not stated in documents provided
Decision date	11 September 1997
Land	Part Portion 2611, DP 752038, Lantana Avenue, being part of the "War Veterans Home" site, Veterans Parade, Collaroy Plateau
Applicant	RSL Veterans' Retirement Villages Ltd, PO Box 56, Narrabeen NSW 2101
Description	Landfill and earthworks including landscaping and parking
Outcome	Approved — Consent No. 97/244
Conditions of consent	<ol style="list-style-type: none"> 1. Development to be generally in accordance with plans numbered 97.165 and 97.165B, both dated 16.6.97, submitted 18 July 1997, as modified by any conditions of consent. 2. The development shall not harm the environment by way of denudation of the land, soil erosion or the transmission of soil and sediment from the land. Appropriate mitigation measures are to be implemented during construction and future use of the land. 3. Payment of \$5,000 to account Reg 009 – *TF 036 prior to issue of building approval or approval for subdivision works as security to ensure all silt and sediment controls are installed and maintained; no transmission of material off the site; and maintenance of all facilities in accordance with Council's Specification for Erosion Control and Sediment Control. 4. Provision shall be made throughout the period of construction to prevent transmission of soil to the public road and drainage system by vehicles leaving the site. 5. Provision of an on-site stormwater detention facility to control the rate of stormwater runoff in accordance with Council's Specification for On-Site Stormwater Detention System Design. 6. Provision of a stormwater quality treatment facility within the site designed in accordance with Council's specifications for Design of Water Quality Treatment Basins.



	<ol style="list-style-type: none"> 7. Requirements of conditions R3, R22 and R20 shall be designed and supervised during works by a qualified Engineer recognised by the Institute of Engineers Australia. 8. Construction and maintenance in perpetuity of a stormwater pollution control system within the site to intercept harmful substances discharging to the public drainage system. 9. Design details, computations and/or support documentation for conditions R3, R20 and R22 to be submitted with the Building Application. 10. The existing Fuel Management Plan for the War Veterans site shall be monitored and maintained to Council's satisfaction. 11. The proposed works shall be carried out in accordance with the staging program detailed in Appendix B of the accompanying Statement of Environmental Effects. 12. The discharge from the existing pipe from the Connie Fall Hostel shall be upgraded to reduce erosion and bank stability. 13. The leachate from the stored vegetative material shall be collected and disposed of to Council's satisfaction. 14. Proposed items (R) and (E), as depicted on plan numbered 97.165, dated 16.4.97, shall be deleted.
Authorised by	Dennis Emery, Manager Local Approval Service Unit, Warringah Council (11 September 1997)

DA number	1997/258
Lodgement date	Not stated in documents provided
Decision date	28 November 1997
Land	Portion 2611, DP 752038, Lantana Avenue, being part of the "War Veterans Home" site, Veterans Parade, Collaroy Plateau
Applicant	RSL Veterans Retirement Villages Ltd, PO Box 53, Narrabeen NSW 2101
Description	Erection of Greenhaven Retirement Village, including 130 x 2 bedroom self care units, community building and associated landscaping and parking
Outcome	Refused
Reasons for refusal	<ol style="list-style-type: none"> 1. Pursuant to s.90(1)(a) and (c2) EP&A Act 1979 — The proposed development is on land that is, or is part of, critical habitat or is likely to affect threatened species, populations or ecological communities, or their habitats.



2. Pursuant to s.90(1)(c), (e), (f) and (h) EP&A Act 1979 and Division 5 of Warringah Local Environmental Plan 1985 — The proposed development will have an unacceptable aesthetic impact on the landscape and scenic quality of the locality, and will mar the landscape and landforms of Narrabeen Lagoon.
3. Pursuant to s.90(1)(m) EP&A Act 1979 — The proposed development will have an unacceptable impact on the existing vegetation on the site and in particular on species of national, regional and local significance.
4. Pursuant to s.90(1)(a) EP&A Act 1979 and State Environmental Planning Policy No. 19 (Bushland in Urban Areas) — The proposed development will disturb bushland reserved for public open space purposes.
5. Pursuant to s.90(1)(b) and (m1) EP&A Act 1979 — The proposed development and its associated work is an unreasonable and inappropriate development, having regard to the potential impacts with the existing natural environment and in particular, will have an adverse impact upon downstream waterways and Narrabeen Lagoon.
6. Pursuant to s.90(1)(r) and (s) EP&A Act 1979 — In the interests of the public and having regard to the importance of the objection by local residents and the circumstances of the case, the development application should be refused.
7. Pursuant to s.90(1)(e)(f) and (h) EP&A Act 1979 — Given the sensitive environmental nature of the site, the proposed development will result in an overdevelopment of the site.
8. Pursuant to s.90(1)(a) and (b) EP&A Act 1979 — Insufficient details have been given in order to properly assess the extent of excavation, earthworks, vegetation removal and retaining walls associated with the development.
9. Pursuant to s.90(1)(g) EP&A Act 1979 — The proposed bush fire mitigation measures are inadequate and will lead to conflicts between the Fuel Free and Fuel Reduced Zones with the vegetation of conservation significance.
10. Pursuant to s.90(1)(a) EP&A Act 1979 — The proposed development will adversely affect the heritage significance of the James Wheeler Homestead and orchards.
11. Pursuant to s.90(1)(a) EP&A Act 1979 and clause 11(2) of State Environmental Planning Policy No. 5 — The proposed development is topographically isolated from the services that the future occupants could reasonably require.
12. Pursuant to s.90(1)(g) EP&A Act 1979 — Insufficient information has been provided with the application to determine if the proposed development will impact on the capacity of the flood plain.



Authorised by	Dennis Emery, Manager Local Approval Service Unit, Warringah Council (28 November 1997)
DA number	2004/0460
Lodgement date	Not stated in documents provided
Decision date	22 February 2005
Land	Lot 2611, DP 752038, Veterans Parade, Wheeler Heights
Applicant	Montego Cay Pty Ltd
Description	Construction of access road to approved Greenhaven Retirement Village
Outcome	Refused
Reasons for refusal	<ol style="list-style-type: none"> 1. Pursuant to s.79C(1)(a)(i), (b), (c), (d) and (e) EP&A Act 1979 and Warringah LEP 2000 — The proposed development is not consistent with the desired future character statements for the B6 – War Veterans locality. The development includes development on land shown cross-hatched on the map where there should only be pathways, passive recreation purposes and the approved vehicular access. 2. Pursuant to s.79C(1)(a)(i), (b), (c), (d) and (e) EP&A Act 1979 and Warringah LEP 2000 — The proposed development is not consistent with the desired future character statements for the B6 – War Veterans locality. The development would result in an undue loss of visually and ecologically significant vegetation species and communities and does not preserve significant natural landforms in their natural state. 3. Pursuant to s.79C(1)(a)(i), (b), (c), (d) and (e) EP&A Act 1979 and Warringah LEP 2000 — The proposed development is not consistent with the desired future character statements for the B7 – Narrabeen Lake Suburbs locality. The development would not appropriately preserve the natural landscape, including rock outcrops, remnant bushland and natural watercourses, and is not well integrated with the natural landscape and topography of the site. 4. Pursuant to s.79C(1)(a)(i), (b), (c), (d) and (e) EP&A Act 1979 and Warringah LEP 2000 — The proposal does not comply with Clause 56 of Part C – General Principles.
Authorised by	Warringah Council (22 February 2005)



Application number	MOD2004/1021 (Modifications 1 and 2)
Date	MOD1 — withdrawal request received (date not stated); MOD2 — letter issued 4 May 2007
Land	Lot 1, Veterans Parade, Wheeler Heights
Applicant	Young & Metcalf Architects, PO Box 18, Paddington NSW 2021
Description	Modification of consent — construction of 16 apartments within RSL War Veterans Village
Outcome	Withdrawn
Notes	MOD1 — applicant requested withdrawal. MOD2 — Council advised proposed changes did not create inconsistencies with Warringah LEP 2000 and could be dealt with under the Construction Certificate. Council suggested MOD2 could be withdrawn with full refund of fees less administration costs (\$65), subject to the Principal Certifying Authority's satisfaction that changes were not inconsistent with the Development Consent.
Authorised by	Peter Robinson, Manager Major Developments, Planning and Assessment Services, Warringah Council (4 May 2007)

Application number	MOD2009/0287
Lodgement date	Not stated in documents provided
Withdrawal acknowledged	22 February 2010
Land	Lot 1, Veterans Parade, Wheeler Heights
Applicant	TSA Management Pty Limited, Level 16, 207 Kent Street, Sydney NSW 2000
Description	Application to modify the emergency access control from James Wheeler Place
Outcome	Withdrawn

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Notes	Applicant advised withdrawal by correspondence dated 29 January 2010. Council confirmed no refund of fees as assessment and associated report had been completed.
Authorised by	Rod Piggott, Team Leader Development Assessment, Warringah Council (22 February 2010)

Application number	MOD2009/0298
Lodgement date	Not stated in documents provided
Decision date	18 March 2010
Land	Lot 2611, DP 752038, Veterans Parade, Wheeler Heights
Applicant	TSA Management Pty Ltd, Level 16, 207 Kent Street, Sydney NSW 2000
Description	Section 96(AA) modification of Development Consent No. 6000/6478 (granted by the NSW Land and Environment Court for construction of 130 x 2 bedroom self-care units) — to use the community building (clubhouse) for a public coffee shop
Outcome	Refused
Reasons for refusal	<ol style="list-style-type: none"> 1. Pursuant to s.79C(1)(a) EP&A Act 1979 — The proposed development is inconsistent with the provisions of Warringah Local Environmental Plan 2000 in that the existing coffee shop facility does not have consent to operate as a shop. 2. Pursuant to s.79C(1)(a) EP&A Act 1979 — The proposed development is inconsistent with the requirement of s.96(AA) of the EP&A Act 1979 in that the proposed modification for a shop is not substantially the same development as the original approval for a Community Building (Clubhouse). 3. Pursuant to s.79C(1)(a) EP&A Act 1979 — The proposed development is inconsistent with the provisions of Warringah Local Environmental Plan 2000 in that the development is inconsistent with the General Principles of Development Control.
Authorised by	Warringah Council (18 March 2010)

Application number	MOD2011/0051
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Lodgement date	9 March 2011
Rejection date	14 March 2011
Land	Lot 1, Veterans Parade, Wheeler Heights
Applicant	TSA Management, 90 Veterans Parade, Narrabeen NSW 2101
Description	Modification of Development Consent DA2009/1327 — alterations and additions to existing structures and use of site for a childcare centre (proposed to substantially increase size of Potts Point building by approximately 50%)
Outcome	Rejected
Reason for rejection	Formally rejected pursuant to Clause 51 of the EP&A Regulation 2000. Pursuant to s.96(2) EP&A Act 1979 — the proposed modification is of such a scale that the additions to the childcare centre do not result in a development that is substantially the same as the original consented development. The original consent involved minor alterations and additions constituting primarily a change of use. The proposal to substantially increase the size of the Potts Point building (approximately 50%) is beyond the scope of what can reasonably be considered under a modification of consent. Application taken for the purposes of the Act never to have been made. Full refund of fees issued.
Authorised by	Steven Findlay, Team Leader Development Assessment, Warringah Council (14 March 2011)

DA number	2011/0596
Lodgement date	Not stated in documents provided
Withdrawal acknowledged	12 July 2011
Land	Lot 1, Veterans Parade, Wheeler Heights
Applicant	TSA Management Pty Ltd, PO Box 56, Narrabeen NSW 2101
Description	Alterations and additions to the Potts Point Cottage and use of this building as a childcare centre
Outcome	Withdrawn



Notes	Applicant advised withdrawal by letter dated 5 July 2011. Partial refund of \$1,528.60 issued (total fees paid \$2,815.75, less notification/public exhibition fee \$830.00 already conducted and assessment fee of \$457.15).
Authorised by	Nick England, Acting Team Leader Development Assessment, Warringah Council (12 July 2011)

DA number	2011/0933
Lodgement date	Not stated in documents provided
Withdrawal date	4 November 2011
Land	Lot 1, Veterans Parade, Wheeler Heights NSW 2097
Applicant	RSL LifeCare
Description	New childcare centre at RSL ANZAC Village, Narrabeen
Outcome	Withdrawn
Notes	Withdrawal requested by letter dated 4 November 2011 from Nicholas Spear, Assistant Project Manager, RSL LifeCare, to Lashta Haidari, Warringah Council. RSL LifeCare confirmed it did not intend to proceed with the proposal and requested a 90% refund of fees on the basis that a new DA for the project would be submitted shortly.
Authorised by	Lashta Haidari, Warringah Council

Application number	MOD2013/0123
Lodgement date	Not stated in documents provided
Withdrawal date	23 September 2013
Land	Lot 1, Veterans Parade, Wheeler Heights
Applicant	Humel Architects on behalf of Old Darby & Joan / RSL LifeCare Ltd
Description	Not stated in documents provided — withdrawal correspondence only
Outcome	Withdrawn

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Notes	Withdrawal confirmed by email from Judy Ellery (Hemel Architects) to Lashta Haidari (Warringah Council) dated 23 September 2013.
Authorised by	Lashta Haidari, Senior Development Assessment Officer, Warringah Council

DA number	2013/1194
Lodgement date	Not stated in documents provided
Withdrawal date	9 December 2013
Land	Lot 1, Veterans Parade, Wheeler Heights
Applicant	TSA Management Pty Limited, Level 16, 207 Kent Street, Sydney NSW 2000 (on behalf of Old Darby & Joan / RSL LifeCare)
Description	Not stated in documents provided — withdrawal correspondence only
Outcome	Withdrawn
Notes	Withdrawal confirmed by email from Natalie Ross (TSA Management) to Lashta Haidari (Warringah Council) dated 9 December 2013. Applicant noted intention to amend and re-submit in January 2014.
Authorised by	Lashta Haidari, Senior Development Assessment Officer, Warringah Council

Application number	MOD2014/0186
Lodgement date	Not stated in documents provided
Withdrawal date	10 October 2014
Land	Lot 1, Veterans Parade, Wheeler Heights
Applicant	BBC Consulting Planners (Dan Brindle) on behalf of RSL LifeCare
Description	Section 96 modification — RSL LifeCare access to James Wheeler Place
Outcome	Withdrawn

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Notes	Withdrawal letter submitted by Dan Brindle (BBC Consulting Planners) to Lashta Haidari (Warringah Council) on 10 October 2014.
Authorised by	Lashta Haidari, Senior Development Assessment Officer, Warringah Council

Application number	MOD2015/0059
Lodgement date	Not stated in documents provided
Withdrawal date	4 August 2015
Land	Lot 1, Veterans Parade, Wheeler Heights
Applicant	BBC Consulting Planners (Dan Brindle) on behalf of RSL LifeCare / TSA Management
Description	Modification of consent — War Veterans Retirement Village (specific description not stated in documents provided)
Outcome	Withdrawn
Notes	Withdrawal requested by Dan Brindle (BBC Consulting Planners) by email to Lashta Haidari (Warringah Council) on 4 August 2015.
Authorised by	Lashta Haidari, Senior Development Planner, Warringah Council

Application number	MOD2015/0294
Lodgement date	Not stated in documents provided
Decision date	23 March 2016
Land	Lot 2611, DP 752038, 1/0 Veterans Parade, Wheeler Heights NSW 2097
Applicant	TSA Management Pty Ltd, Level 16, 207 Kent Street, Sydney NSW 2000
Description	Modification of Development Consent DA2008/0802 — demolition of existing 34 dwellings and re-construction of 34 new dwellings in Cutler Village at the RSL War Veterans Village
Outcome	Approved

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Conditions of consent	<p>1. Condition No. 1A — Development to be carried out in compliance with the following approved plans and documentation (except as amended by any other condition of consent):</p> <p>Architectural Plans endorsed with Council's stamp:</p> <ul style="list-style-type: none"> — DA1 (Rev C), December 2015, Humel Architect — DA08–DA13 (Rev A), December 2015, Humel Architect — DA49–DA60 (Rev A), December 2015, Humel Architect — Exterior Finishes, 23 December 2015, Humel Architect <p>Reports / Documentation:</p> <ul style="list-style-type: none"> — BCA Assessment Report, 16 December 2015, Blackett Maguire Goldsmith <p>Waste Management Plan:</p> <ul style="list-style-type: none"> — Waste Management Plan, 23 December 2013, Humel Architect <p>2. Condition <1A — Development must be carried out in compliance with the requirements of the NSW Rural Fire Service (eServices Reference: Response NSW RFS).</p> <p>Note: This modification is to be read in conjunction with Development Application No. DA2008/0802, dated 4 January 2010. On-site works cannot proceed unless a Construction Certificate has been lodged with and approved by Council or an accredited certifier, and relevant conditions of the Development Application have been carried out.</p>
Authorised by	Lashta Haidari, Senior Development Planner, Warringah Council (23 March 2016)

DA number	2018/0740
Lodgement date	8 May 2018
Withdrawal date	10 September 2018
Land	Lot 1, Veterans Parade, Narrabeen
Applicant	TSA Management Pty Ltd on behalf of RSL LifeCare
Description	Seniors' housing development
Outcome	Withdrawn
Notes	Following public exhibition, Northern Beaches Council issued a letter dated 23 August 2018 inviting TSA to withdraw the DA (with a partial

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	refund of fees), advising that otherwise a recommendation for refusal would be issued to the Sydney North Planning Panel for determination. Applicant requested withdrawal on 10 September 2018.
Authorised by	Lashta Haidari, Principal Planner, Northern Beaches Council

DA number	2022/1236 (PAN-245181)
Lodgement date	Not stated in documents provided
Return date	27 July 2022
Land	Lot 1, Veterans Parade, Narrabeen
Applicant	RSL LifeCare Limited, 120 Pacific Highway, St Leonards NSW 2065
Description	Alterations to seniors' housing development (specific description not stated in documents provided)
Outcome	Returned — incomplete application
Reasons for return	<ol style="list-style-type: none"> 1. Boundary Identification Survey — A Boundary Identification Survey prepared by a registered surveyor required. Survey must show surveyor's name and registration number, be less than 24 months old, and must clearly stipulate that boundaries of the site have been identified by survey. 2. Bushfire Report — A Bush Fire Hazard Assessment Report required as the land is situated in Bush Fire Prone Land. As the development is for alterations to a seniors' development, it must be referred to the RFS who will require this documentation to issue GTAs. 3. Preliminary Geotechnical Report — Required as the land is located in Landslip Risk Area "D" under Council's Landslip Risk Map. Report to be prepared by a suitably qualified geotechnical consultant.
Authorised by	Northern Beaches Council (27 July 2022)

DA number	2022/1262 (PAN-246507)
Lodgement date	Not stated in documents provided
Return date	30 July 2022

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Land	Lot 1, Veterans Parade, Narrabeen
Applicant	RSL LifeCare Limited, 120 Pacific Highway, St Leonards NSW 2065
Description	Alterations to seniors' housing development (specific description not stated in documents provided)
Outcome	Returned — incomplete application
Reasons for return	<ol style="list-style-type: none"> 1. Bushfire Report — A Bush Fire Hazard Assessment Report required as the land is situated in Bush Fire Prone Land. As the development is for alterations to a seniors' development, it must be referred to the RFS who will require this documentation to issue GTAs. 2. Preliminary Geotechnical Report — Required as the land is located in Landslip Risk Area "D" under Council's Landslip Risk Map. Report to be prepared by a suitably qualified geotechnical consultant.
Authorised by	Northern Beaches Council (30 July 2022)

A common theme throughout all of these Refused and Withdrawn applications is height, bulk and scale, community concerns pertaining to traffic and impact on local street network and parking, tree removal, aboriginal and cultural heritage, ecological issues, Bushfire and Emergency Evacuation and land slip and site conditions.

It is worth noting that the most dense project that has been previously refused was DA1997/258 - Erection of Greenhaven Retirement Village, including 130 x 2 bedroom self care units, community building and associated landscaping and parking. This application now proposes density fifteen times that! Collaroy Plateau has naturally become more dense over that past 25 years which has significantly exacerbated the local road network issues yet the built form and character has remained low scale.

Conclusion

We reiterate that we are not opposed to seniors housing on this site. We acknowledge the RSL LifeCare mission and are supportive of a scheme of reasonable scale. However, the current proposal is not of a reasonable scale. It exceeds what would be permitted even under the most permissive contemporary housing controls in NSW, and the supporting technical work falls well short of what is required for a development of this significance. The Agents (Colliers) who prepared the application along with the Community Engagement Consultant, VIA consultant and Traffic Consultant need to be placed under significant scrutiny in respect of the quality of this application made and DPHI should uphold the integrity of the REAP process and request a significant re-construction of the application that is predicated on quality and actual data. The entire EIS and application itself is nothing short of misleading, poorly crafted and disingenuous.

We respectfully request that DPHI:

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- Decline to approve the Concept Plan in its current form and direct the applicant to reduce building heights and massing to the levels outlined in this submission;
- Require a rigorous, survey-accurate VIA and streetscape character analysis from Lantana Avenue before any determination is made including a view loss assessment from properties along Lantana Avenue and Anzac Avenue;
- Require proper community consultation in accordance with DPHI guidelines with engagement with the local community;
- Commission a Traffic peer review and require independent traffic and parking surveys before determining the Clause 4.6 variation request and seriously consider the safety of moving the existing residents of War veterans and the existing community at large in a bushfire event let alone with the increased density proposed in this application,
- Expand the width of the Lantana Avenue carriageway width on the northern side to improve local access for busses and vehicles to pass and the community and visitors to the residents of RSL life care to park on the northern side of the street 24/7.
- Any application favourably considered must heavily condition traffic management and no on street parking on Lantana during construction and regular reporting requirements back to DPHI on compliance and consultation with the community.
- Ensure that emergency evacuation planning for the development and the surrounding community is fully and independently assessed.
- Have the EIS package re prepared in its entirety and place it through a rigorous Test of Adequacy process prior to re - exhibition.
- Caution the agents (Colliers) reminding them of their duties as a REAP Accredited Planner.

We thank the Department for the opportunity to make this submission and welcome the opportunity to discuss these matters further and welcome the officer into our home and community of Lantana Avenue.

Yours faithfully,



Chris Wilson
 Managing Director
 Willowtree Planning (NSW) Pty Ltd

On behalf of the owners of 19a Lantana Avenue, Wheeler Heights NSW 2097

In the spirit of reconciliation and recognition, Willowtree Planning (NSW) Pty Ltd acknowledges the Traditional Owners of this Country throughout Australia and their continuing and ongoing connections to land, waters and community. We show our respect to Elders – past and present.

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Feedback Submission 2

THE REIMAGINING THE VILLAGE PROJECT - RE-DEVELOPMENT OF THE VILLAGE.

My name is [REDACTED] and I live at [REDACTED]
[REDACTED] (Lawrie Goss). I am 75 years of age.

I lived in [REDACTED] for 63 years before moving to the Village. With the promise by the then Village Management that I would be looked after until the end.

RSL Life Care is supposed to be a charity organisation a "non profit organisation". Not for corporative gain or for vanity projects.

I moved into [REDACTED] in 2016, just before Christmas. I sold my home in [REDACTED] and was looking forward to a nice, peaceful life in the village. (I am in the independent living section.)

With the promise that when I was unable to care for myself, I would be moved to the Dementia Ward and then if really unwell, to the Care Unit. The Dementia Ward has been closed down for over 2 years. This does not look like it will happen, with the re-development plans as such. I live on my own and have recently retired. I worked as a Practice Manager for 5 Surgical Specialists in [REDACTED] This I did for over 30 years.

I had great expectations of living out my life in peace and quite of the Village which I was promised.

I am very stressed all the time now, (as are others in the Village), as I have been told my Unit, along with 6 other neighbours, will be demolished. My family live in [REDACTED] and [REDACTED] respectively.

We are in the Stage 2 of the plan and with the noise, dust and having to get around the village, things are looking very stressful. Trucks coming

and going all day long.

The effects of all this stress has impacted on my health, both physically and psychologically, I sometimes am awake until the early hours of the morning. I have had to revert to taking sleeping pills on several nights just to be able to fall asleep and function the next day. I have sought medical advice for this.

The plan for the Village, in my opinion and that of my neighbours, does not benefit the current people living in the Village.

They are talking about building 5 to 8 storey buildings. This means the elderly will have to use lifts. As we all know, these tend to break down more often than not. The expense of servicing them is very high, which means this expense will be passed onto the elderly pensioners.

The development, we were told, will take up to 15 years of building works. Apparently the plan has not yet been submitted for approval. This will be very stressful for us all, including the neighbours along the other side of the road along Lantana Avenue.

I am on an Aged Pension and this is my only income, so I have no options. My other most important concern is the I have had [REDACTED] and I can't do stairs. I need level ground access to and from my unit, which I have at the moment.

Surely the demolition of the 6 Units (Lawrie Goss) can be avoided. We don't need more coffee shops here. We don't also need all our long standing trees and animal life to disappear.

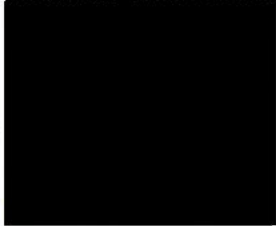
Another factor of great importance is - a few years ago we all were told to evacuate the Village, due to the fires coming up the gully behind us. If we have 8 storey buildings, what happens if the lifts go out and the disabled elderly people have trouble getting out. We are told not to use lifts in case of fires. How would they get out.


There is a lot of bush at the end of Lantana Avenue, so this is a major issue. Lantana is also a "no through road". As this is a dead end street,

the issue of access to and from is a major problem for emergency services, police and fire vehicles. There is limited evacuation access, which endangers future residents and emergency services. (They are proposing 205 extra occupants to the Village.)

This is not responsible planning in my opinion.

Please take all of the residents concerns and stress levels into account.

Please. 

Regards,


2nd April, 2026.



Feedback Submission 3

FORMAL SUBMISSION OF OBJECTION

Project: ANZAC Village Seniors Housing Redevelopment (SSD-85869467)

To: Department of Planning, Housing and Infrastructure, NSW Government

Submitter: SOS Save Our Suburb Mona Vale Inc, a Registered Incorporated Non-Profit Association, INC 2501532 - ABN 20 873 778 705

Position: Strict Opposition and Demand for Direct Panel Intervention

1. Executive Summary & Context of Representation

This submission is formally lodged by **SOS Save Our Suburb Mona Vale Inc. known as SOS Mona Vale** on behalf of our 600+ members and more than 1,400 registered supporters across the Pittwater LGA.

A small number of our membership resides permanently within ANZAC Village (including the Colooli precinct), a greater number have family ties or are friends of residents of this vulnerable community. The "War Vets" is a significant group in the make up of our community and we are concerned for our neighbours.

On **Friday 15 May 2026**, John David as Secretary and Convenor of SOS Mona Vale attended a crisis community meeting at the village attended by **70 deeply distressed residents**, convened by the Member for Pittwater, **Jacqui Scruby MP**.

The comments and concerns at this meeting form the evidentiary backbone of this submission. These elderly residents are not merely inconvenienced; they are bewildered, angry, confused, and feeling systematically locked out of the planning process.

We write to elevate their concerns to a strict planning objection, supported by the lived experiences of the village's residents.

2. Procedural Injustice: The Digital Exclusion of Elderly Stakeholders

SOS Mona Vale raises a grave procedural objection regarding how this State Significant Development (SSD) public exhibition has been executed. The Department's total reliance on modern, high-tech submission processes via the NSW Planning Portal has effectively disenfranchised the very population this development impacts.

- **Physical and Technological Barriers:** The majority of residents at ANZAC Village are in their 80s and 90s. Many face age-related physical and cognitive impairments, including visual decline, arthritic mobility issues, and a lack of digital literacy.
- **Systemic Exclusion:** No easy accommodation, physical paper-based infrastructure, or administrative assistance has been provided by the developer or the Department to help these vulnerable citizens lodge objections. It has been left to our local member to make arrangements on behalf of the residents, The planning process has literally "beaten" them through structural exclusion.
- **Formal Request for an On-Site Hearing:** Because the official "volume of submissions" on the portal is an artificially suppressed metric that fails to capture the true scale of community anxiety, **SOS Mona Vale formally requests that the Planning Panel take the unusual but necessary step of convening an in-person, on-site public hearing at**

the Village. This must mimic the localised, accessible dispute resolution practices utilised by the NSW Land and Environment Court, ensuring impaired residents, many of them being veterans and widows can have their views recorded firsthand and provides them with the dignity that their contribution and service to the nation entitles them to.

3. The 15-Year Timeline: A Lifetime Sentence to a Construction Zone

The Environmental Impact Statement (EIS) outlines a massive, multi-stage redevelopment stretching over a projected **15-year timeline**. For an average resident moving into a seniors' living community, this timeline transforms a haven into a lifelong detriment.

- **Deprivation of Peaceful Sunset Years:** Residents entered this village with the reasonable expectation of spending their remaining years in a low-density, tranquil coastal retirement environment.
- **Permanent Construction Zone:** For an individual in their 80s or 90s, a 15-year construction window means they will spend the entirety of their remaining natural life residing inside an active, high-impact industrial construction zone.
- **Severe, Unmitigated Health Risks:** The cumulative psychological and physical toll of continuous structural vibration, heavy machinery noise, toxic diesel mechanics, and particulate dust exposure over a decade and a half is a severe health hazard to a frail demographic. Prolonged stress is a verified health accelerator for the elderly—many of whom are veterans and war widows who have proudly served this country. It represents an unacceptable failure of the operator's duty of care as a PCBU under the *Work Health and Safety Act 2011* framework.

4. Stage 1 Capital Exploitation: Erasing Aged Care for High-Yield Units

A deeply cynical component of the developer's master plan is the immediate target of Stage 1: **the systematic elimination of vital nursing home facilities in favour of Independent Living Units (ILUs).**

- **Prioritizing Real Estate Over Clinical Care:** Nursing home beds provide essential, high-level clinical care for the frailest members of our community. By demolishing these facilities to construct independent apartments, the developer is actively reducing the site's critical care capacity.
- **The Premium-Price Drive:** ILUs generate massive upfront capital inflows through high-price inbound premiums and exit fees. The corporate strategy clearly prioritizes high-yield real estate development over the long-term, non-profit clinical support of aging residents.
- **Displacement Trauma:** Forcing vulnerable residents out of existing care environments during Stage 1 creates immediate relocation stress and trauma, entirely fracturing the social and medical fabric of the village community.

5. Institutional Vulnerability and Resident Apprehension

SOS Mona Vale wishes to bring a critical, systemic issue to the Panel's attention: **the profound fear of personal repercussions among the resident population.** Because the developer is simultaneously the landlord, outright owner, and care provider, a distinct and coercive power imbalance exists.

- **Atmosphere of Fear:** Many elderly residents who vehemently oppose this high-density expansion have chosen not to lodge individual submissions out of fear of administrative pressure, housing insecurity, or subtle management retaliation.
- **History of Pressure:** This anxiety is directly tied to a reported history of pressure placed on residents who have previously spoken out against the management. Complaints regarding safety, environmental breaches, and resident impacts have on occasion been routinely minimised or dismissed.
- **Collective Representation:** A retirement village must prioritise safety, dignity, and peaceful enjoyment. When residents are afraid to speak out about their own living conditions, the planning process is compromised. SOS Mona Vale seeks to provide a voice for silent residents. We urge the Panel to interpret the volume of individual objections not as the total sum of community anxiety, but as a fraction of a population living under intense stress at a particularly vulnerable stage of their lives.

6. Incompatibility with Strategic Controls & Suburb Character

The proposed redevelopment transitions a historically low-density, peaceful coastal retirement setting into an urbanised "retirement super-city". This represents an aggressive erasure of local character and a severe overdevelopment of the Collaroy Plateau:

- **Traffic & Infrastructure Gridlock:** The surrounding road networks were engineered decades ago for low-density usage. The introduction of intensive construction traffic (concrete trucks, heavy machinery) alongside permanent increases in resident, visitor, and service vehicles will paralyse these narrow, already constrained corridors.
- **Pedestrian Failure:** The existing pedestrian network within the village lacks even, contiguous footpaths. Forcing vulnerable residents using mobility scooters, walking frames, and wheelchairs to navigate narrow roads shared with heavy construction traffic creates an unacceptable, and potentially fatal safety hazard.
- **Environmental Degradation:** The planned removal of mature canopy trees and native vegetation will permanently dismantle the unique lakeside and bushland setting that defines the amenity of the area.

7. Strict Conditions and Actions Required

SOS Mona Vale insists that the Department and the Panel **refuse the application** in its current form. Should the project proceed toward any pathway of approval, the community demands the implementation of the following strict, non-negotiable safeguards:

1. **Mandatory On-Site Public Hearing:** The Panel must hold a physical, accessible session within the ANZAC Village precinct to gather verbal submissions from digitally excluded and physically impaired residents.
2. **Independent Medical & Health Impact Assessment:** A comprehensive, third-party epidemiological review must be conducted to analyse the cumulative effects of multi-year dust, noise, and diesel exposure on an immunocompromised and elderly resident base.
3. **Protection of Care Facilities:** A strict condition of consent must mandate that no existing nursing home beds or clinical care spaces are to be demolished or

decommissioned until a modern, equivalent care facility is fully constructed and operational elsewhere on-site.

4. **Establishment of an Independent Compliance Monitor:** Construction oversight cannot be left to a private certifier or the developer's internal management. A fully independent compliance officer must be stationed on-site—funded by the developer but reporting directly to Northern Beaches Council and the EPA—with the immediate power to issue "Stop Work" notices for amenity breaches.
5. **Anonymous, Third-Party Whistleblower Portal:** An enforceable, legally binding communication framework must be established under the *Retirement Villages Act 1999* (NSW) ensuring residents can report safety and construction breaches completely anonymously, protecting them from institutional repercussions.
6. **Significant Scale-down of Bulk and Scale:** A substantial reduction in total unit yield, building heights, and overall development intensity to respect the transitional built form of the Collaroy Plateau and preserve vital open green space.

Conclusion

The proposal as it stands represents an aggressive, developer-led densification model that treats a community of vulnerable seniors as an empty plot of land. The project sacrifices essential aged care facilities to maximize future real estate yields while sentencing our elderly citizens, veterans, and war widows to live out their final days in an industrial construction zone.

We request that the Panel protect those who protected our country. Reject this application.

Yours sincerely,



John David on behalf of

The Convenors & Executive Committee

SOS Save Our Suburb Mona Vale Inc.

www.sosmonavale.com.au



Feedback Submission 4



Re: Proposed redevelopment of RSL ANZAC Village Narrabeen

My mother is a resident there and has asked me to write to you on her behalf.

She, and other residents I have spoken to, feel that this wholesale reconstruction of their village is a breach of trust regarding the implied preservation of the amenity which they assumed they had purchased.

She is most concerned about -

- the end of the quiet neighbourhood and character of the village she loves
- the obvious noise and disruption that these works will produce - probably for the rest of her life.

Construction of 17 multi-story buildings

- will produce dust, noise and disruption that these residents must endure for the rest of their lives
- Is the direct opposite of their expectations of life at RSL Anzac Village when they signed up.

The removal of 450 trees is another topic concerning the residents I have spoken to - will council allow this, given current sensitivity around climate and environment matters?

Residents also see risks of permanently altering the 'low-rise' quiet character of this part of Narrabeen, which they love.

(My own concern is that this development will set an unwelcome precedent, possibly affecting my own neighbourhood).

Elderly residents (plus residents in surrounding streets) will live with the consequences of this decision every day.

I urge Council to prioritise the wellbeing of residents and the integrity of the local area above RSL profits when considering this proposal.

Your's faithfully,



Feedback Submission 5

YOUR STANCE ON THE PROJECT

What is your view on the project? *I don't agree*

I support the project

I am providing comments

I object to the project

Please provide your views in the space below. If you prefer or do not have sufficient space to provide all of your views, indicate below and provide your own attachment.

I am providing my own attachment

Warning! If you wish to maintain your privacy, do not include personal information below or in any attachments.

I am concerned because of limited mobility & education about my relocation. I used to be close my carer and power of attorney who ~~lives~~ ^{lives} next to me.

I am concerned with the effect of the proposal on my mobility around the village. I fear that increased costs of maintaining the increased development will be endeavoured to be passed on ~~to~~ to residents – I am not able to meet this and it stresses me. My wellbeing is being severely impacted and I came to the village expecting a harmonious retirement – not all this stress.

When you make a submission, we will publish:

- Your name (unless you request it be withheld)
- Your suburb
- Your submission and any attachments (including any personal information you have included in those documents)
- Any political donations disclosure statement, in accordance with the *Environmental Planning and Assessment Act 1979*

If you wish to maintain your privacy, you can request your name is withheld from the list of submitters published on the NSW Planning Portal.

Would you like to request your name be withheld?

Yes

No

ONLY TO BE USED BY THE DIRECT RECIPIENT – NOT FOR FURTHER REDISTRIBUTION



Feedback Submission 6

YOUR STANCE ON THE PROJECT

What is your view on the project?

- | | | |
|--|--|---|
| <input type="checkbox"/> I support the project | <input type="checkbox"/> I am providing comments | <input checked="" type="checkbox"/> I object to the project |
|--|--|---|

Please provide your views in the space below. If you prefer or do not have sufficient space to provide all of your views, indicate below and provide your own attachment.

I am providing my own attachment

Warning! If you wish to maintain your privacy, do not include personal information below or in any attachments.

BUILD POOL PLUS EXERCISE AREA BEFORE POOL AND EXERCISE IS DUG UP

When you make a submission, we will publish:

- Your name (unless you request it be withheld)
- Your suburb
- Your submission and any attachments (including any personal information you have included in those documents)
- Any political donations disclosure statement, in accordance with the *Environmental Planning and Assessment Act 1979*

If you wish to maintain your privacy, you can request your name is withheld from the list of submitters published on the NSW Planning Portal.

Would you like to request your name be withheld?

- Yes No

ONLY TO BE USED BY THE DIRECT RECIPIENT – NOT FOR FURTHER REDISTRIBUTION



Feedback Submission 7

[REDACTED]
[REDACTED]

20 May 2026

Department of Planning, Housing and Infrastructure

By submission via the NSW Planning Portal

RE: OBJECTION TO STATE SIGNIFICANT DEVELOPMENT APPLICATION

Application No: SSD-85869467

ANZAC Village Seniors Housing – Concept & Stage 1 Development

90 Veterans Parade, Narrabeen NSW

Dear Planning Assessment Officer,

I write to formally OBJECT to the above-referenced State Significant Development application submitted by RSL Lifecare Limited for the redevelopment of ANZAC Village at 90 Veterans Parade, Narrabeen. While I acknowledge the importance of providing seniors housing, this proposal in its current form is fundamentally incompatible with the existing neighbourhood character, and I urge the Department to refuse or substantially modify the application.

GROUNDS FOR OBJECTION

1. Traffic and Transport Impacts

The proposal will generate a significant increase in traffic movements on already congested local roads. The provision of up to 1,600 basement and at-grade car parking spaces, combined with 399 independent living units, a 104-bed residential care facility, seven townhouses, and a cafe, will result in unacceptable traffic volumes on Veterans Parade and surrounding streets including Lantana Avenue. The road network in this area is not designed to accommodate traffic of this scale. No meaningful traffic impact assessment has been shared with the community, and the cumulative traffic impact of all five proposed stages has not been adequately addressed. Parking on Lantana Avenue is limited to the northern side of the street and the introduction of greater ILU density will place even greater strain on the already non-existent on street parking.

2. Unacceptable Visual Impact

The concept plan proposes buildings ranging from one to eight storeys across 15 building envelopes. Buildings of up to eight storeys are entirely out of keeping with the surrounding low-density residential environment. The visual bulk and massing of this development will dominate the skyline and create an oppressive urban form that is wholly inconsistent with the established neighbourhood. The visual impact on residents of Lantana Avenue and surrounding streets will be severe and permanent.

3. Significant Tree Loss and Environmental Harm

Stage 1 alone proposes the removal of up to 131 trees. This represents an enormous loss of established tree canopy, biodiversity habitat, and urban green infrastructure in a locality that values its natural environment. The loss of mature trees will have lasting negative consequences for local ecology, urban heat, stormwater management, and the amenity of the area. While the proposal claims to replant 151 trees, small replacement plantings cannot substitute for the environmental value of mature established trees. Across all five stages of the concept plan, the total tree loss will be far greater.

4. Incompatibility with Lantana Avenue Streetscape and Character

Lantana Avenue is characterised by low-density residential development, predominantly of one and two storeys. The proposed development, when viewed from and along Lantana Avenue, will present a built form that is completely alien to the existing streetscape. The maximum two-storey scale that defines the residential character of Lantana Avenue must be respected in any development fronting or visible from this street. The current proposal makes no attempt to provide an appropriate transition in building height and bulk between the development site and the adjoining low-density residential neighbourhood. This is unacceptable and must be rectified.

5. Loss of Views

The proposed multi-storey buildings will cause significant and permanent view loss for residents on Lantana Avenue and surrounding streets who currently enjoy views over the lower-scale ANZAC Village site. Views to the north, east and surrounding landscape from private dwellings will be substantially impeded by buildings of four to eight storeys. View loss of this nature represents a direct diminution of property values and the amenity of established residents, and has not been adequately addressed in the application.

6. Failure to Engage with the Community

The community has had no meaningful engagement with RSL Lifecare or the Department prior to this application being lodged. Residents of Lantana Avenue and the surrounding neighbourhood were not consulted, not invited to participate in the design process, and were not informed of the proposal until the formal exhibition period commenced. This top-down approach is deeply concerning for a project of this scale and significance. Genuine community consultation should have been undertaken before the application was submitted, not as a token formality after it was lodged. I call on the Department to require the applicant to undertake proper community engagement before this application proceeds further.

7. Excessive Density and Scale

The proposal seeks approval for a maximum gross floor area of 72,000 square metres across 15 building envelopes, delivering approximately 399 independent living units, 104 residential care beds, seven townhouses, and a cafe. This level of density is entirely disproportionate to the surrounding residential context. The concentration of so much development on a single site, in close proximity to a low-

density residential street, will fundamentally and irreversibly alter the character of the area. The scale of this project is more appropriate for a major town centre, not a suburban residential neighbourhood adjacent to Lantana Avenue.

8. Inconsistency with Low-Density Residential Character of Lantana Avenue

Lantana Avenue is a quiet, low-density residential street. The character of this street, defined by single and double-storey dwellings set within generous landscaped lots, represents the community standard that has been established over many decades. This proposal, with its multi-storey towers, high-density land use, and urban-scale infrastructure, is fundamentally at odds with the established and desired future character of Lantana Avenue and its environs. Approval of this application would set a devastating precedent for the erosion of the low-density residential character that defines this neighbourhood.

WHAT I AM ASKING THE DEPARTMENT TO DO

I respectfully request that the Department:

- Refuse the application in its current form, given its incompatibility with the surrounding neighbourhood;
- Require the applicant to undertake genuine and meaningful community consultation before any revised application is considered;
- Mandate that building heights visible from and fronting Lantana Avenue be limited to a maximum of two storeys, consistent with the existing streetscape;
- Require a comprehensive traffic survey to be undertaken of Lantana Avenue on street parking and have the applicant consider widening Lantana Avenue on the northern side of the road and reinstate on street car parking on both sides of the street;
- Require the applicant to substantially reduce the overall density and scale of the development to be compatible with the low-density residential character of the neighbourhood;
- Require a full peer review / independent arborist report and significantly reduce the number of trees proposed for removal. All new development should remain below the existing tree canopy on the site;
- Require a view impact assessment from affected properties on Lantana Avenue and surrounding streets including a streetscape character analysis; and
- Give consideration to the density being proposed and given the Bushfire Affectionation of the land — what is the emergency evacuation plan?

I trust the Department will give careful consideration to these objections and to the concerns of the many residents who will be directly impacted by this proposal. I am happy to provide further information if required.

Yours sincerely,

██████████

[REDACTED]

[REDACTED]



Feedback Submission 8

Dear Representatives of the Northern beaches

My Name is [REDACTED] I am son of [REDACTED] who is a resident at the LifeCare ANZAC Village.

I am contacting you regarding the proposed redevelopment of RSL LifeCare ANZAC Village and the likely effect it will have on current residents over an extended period of time.

My Brother and I are increasingly concerned about the implications of a redevelopment program that may continue for well over a decade while elderly residents remain living within the village. My mother [REDACTED] is a resident there for the last 7 years, and moved into ANZAC Village specifically to obtain certainty, security, and a supportive environment during later stages of her life. Instead, she is now facing the prospect of living alongside major construction activity for many years.

I am concerned that ongoing exposure to construction noise, dust, vibration, traffic changes, reduced accessibility, and general disruption has the potential to significantly affect her both physical and mental wellbeing.

There is also concern about the removal or alteration of existing facilities such as the pool that she uses 4 times per week to keep up her mobility and is essential for her ongoing general health. She is also concerned she will lose her parking garages, which are close to her residence. Will there be compensation arrangements provided for this loss?

While redevelopment and renewal may ultimately provide benefits, it is difficult to understand how residents currently living in the village can maintain an acceptable quality of life during such an extended construction period without far stronger protections and support measures in place.

I believe this situation warrants close scrutiny, particularly in relation to:

- Whether residents are being adequately informed and genuinely consulted throughout the planning and delivery process
- The adequacy of safeguards to minimise noise, dust, safety risks, and access disruptions within an occupied retirement community
- The suitability of existing NSW retirement village laws to deal with redevelopment projects of this scale and duration
- The rights of residents whose living conditions, facilities, or sense of security may be materially diminished during the redevelopment
- Options available for residents who may no longer be able to reasonably remain in their homes during major works.
- Keep the a pool open that is available for use during reconstruction.

I am also concerned about the broader precedent this may set for retirement village redevelopments more generally. Older Australians who enter these communities do so with reasonable expectations about stability and liveability. It is important that redevelopment objectives do not override the wellbeing and dignity of existing residents.

I would appreciate your attention to these concerns and any action you may be able to take to ensure residents are properly protected and supported throughout this process.

Thank you for your time and consideration.

Yours sincerely,

[REDACTED]