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Attention: Assessment Officer
The Department of Planning, Housing and Infrastructure
NSW Government - Major Projects

To whom it may concern,

I am writing to formally object to the proposed large-scale seniors housing development at 1–3 Skyline Place, Frenchs Forest (SSD-69850712).

My objection is based on concerns shared by myself, both as a resident and long-term member of the local business community, and is supported by evidence from the applicant's own documents, past planning decisions, and Northern Beaches Council's strategic policies.

My concerns and supporting evidence are outlined below.

Traffic and Congestion

Frenchs Forest Road East already experiences heavy traffic volumes during peak hours.

The developer's own Transport and Accessibility Impact Assessment shows existing two-way flows of 1,350 vehicles/hour at peak times, with intersections operating at near capacity.

The proposal predicts an additional 125–136 vehicle movements per peak hour, yet the cumulative impacts of other developments, including the Frenchs Forest Town Centre, were not assessed. This omission directly undermines claims that traffic impacts will be minimal, given well-documented existing congestion.

Moreover, the developer's assessment does not accurately reflect real-world conditions, as it only considers this proposal in isolation. It completely fails to account for:

- The cumulative traffic generated by the first Jardin seniors development (52 units at 7 Skyline Place).
- The Jardin expansion currently under construction at 5 Skyline Place (104 units).
- The future Frenchs Forest Town Centre, which will significantly increase traffic on Frenchs Forest Road East, Warringah Road, Wakehurst Parkway, and surrounding arterials.
- Other approved and anticipated developments in the precinct.

Given the scale of this proposal, an independent traffic assessment - not one commissioned and paid for by the developer - must be prioritised to ensure a transparent, objective analysis of likely impacts.

Once this development is built, there will be no opportunity to reverse the consequences of worsened congestion, a problem already well documented by residents across the Northern Beaches.

A comprehensive, cumulative traffic impact assessment must be completed before any approval is granted.

Parking Deficiencies

With the permanent 24/7 clearway on Frenchs Forest Road East, introduced as part of the Northern Beaches Hospital development, eliminating all on-street parking, local residents are left with no option but to rely entirely on Skyline Place for parking.

Yet the proposed development offers only 22 visitor spaces for 200 independent living units in Stage 1, along with just 14 commercial spaces. These numbers are completely inadequate for a project of this scale. How can this possibly accommodate the real needs of residents, visitors, staff, deliveries, and medical services?

The Transport Report's assumption that most seniors will not own or drive cars ignores reality. As soon as residents began moving into the first Jardin development (5 Skyline Place), available parking in Skyline Place was immediately overwhelmed. This situation has worsened further with the occupation of ground-floor commercial tenancies. We have yet to see the completion of the second Jardin development (7 Skyline Place), which will place even greater pressure on already strained parking resources.

How can this small cul-de-sac absorb additional parking demands from more residents, visitors, and commercial tenants? More importantly, where are the original residents along Frenchs Forest Road East supposed to park, given they lost all on-street parking to the clearway?

Compounding these issues, the Transport and Accessibility Impact Assessment fails entirely to consider or analyse likely spill-over parking impacts into surrounding streets if on-site parking proves inadequate, despite clear evidence from the first Jardin development and firsthand local experience showing Skyline Place and nearby streets are already congested with limited parking capacity. This omission leaves existing residents vulnerable to increased illegal parking, blocked driveways, and compromised safety for pedestrians.

Loss of Industrial Land and Local Employment Opportunities

The site is zoned SP4 Enterprise, intended to support employment and light industry, fostering economic diversity on the Northern Beaches.

The Environmental Impact Statement and Social Impact Assessment both acknowledge that shifting the site's use from warehouses/offices to seniors housing will reduce employment diversity, undermining opportunities for young families, small businesses, and the local economy.

The proposal would permanently remove scarce industrial premises in a region already suffering from a shortage of such spaces, directly contradicting the SP4 zoning objective to *"provide a range of facilities and services, light industries, warehouses, and offices."*

As a member of the Northern Beaches Business & Industry Stakeholder Committee, I have seen firsthand the statistics and data confirming the Northern Beaches' chronic lack of employment diversity and the region's overreliance on retail, hospitality, and health sectors. This imbalance forces many residents to commute outside the area for work, exacerbating traffic congestion and harming work-life balance of residents. Safeguarding industrial and business lands like Skyline Place is essential for reversing this trend, providing local jobs in logistics, light manufacturing, technology, and professional services.

Council's Assessment Report for the second Jardin development at 5 Skyline Place strongly supports this concern. It concluded that introducing large-scale seniors housing into the business park would:

- Be fundamentally inconsistent with the Hospital Precinct Structure Plan and Council's Local Strategic Planning Statement (Towards 2040), both of which prioritise maintaining Frenchs Forest as a health, education, and employment hub.
- Directly conflict with the B7/SP4 zoning objective of protecting employment lands, thereby diminishing the capacity of the business park to accommodate future economic opportunities and high-value employment.
- Undermine the area's strategic role as a critical employment precinct, which Council highlighted as essential given the Northern Beaches' existing lack of industrial and commercial diversity.

As Council's Strategic and Place Planning team concluded:

"Whilst housing for seniors, affordable housing and disability housing is important, the B7 Business Park zone is not the appropriate location as it will compromise the strategic advantage of the business park and the future capacity of surrounding businesses to respond to economic opportunities."

These findings reinforce that approving this development would permanently erode the ability of Frenchs Forest and the broader Northern Beaches to diversify their local economy, leaving residents with fewer local job opportunities and increasing reliance on commuting — outcomes that run directly counter to Council's and the community's long-term objectives.

Loss of Trees and Native Bird Habitat

The Arboricultural Impact Assessment identifies the removal of at least 57 mature native trees, including species like Tallowwood, Scribbly Gum, and She Oak — all vital nesting and foraging habitat for native birds.

Neither the AIA nor the Ecologically Sustainable Development Report proposes equivalent habitat replacement or restoration of comparable canopy volume, resulting in permanent fragmentation of green corridors, reduced biodiversity, and weakened climate resilience.

This directly contradicts the Northern Beaches Council’s draft Tree Management Policy (2025) and Tree Canopy Plan (2023), which call for:

- Maximising tree cover and canopy connectivity across natural areas, parks, and urban lands;
- Addressing canopy loss on private lands, which is outpacing public planting efforts and threatening targets for 40% canopy cover by 2036;
- Recognising community support (78% in recent engagement) for stronger tree retention and protection measures.

The Council’s Tree Canopy Plan specifically warns that *“ongoing loss of mature trees, especially on private developments, risks fragmenting canopy corridors and reducing habitat for native wildlife.”*

Alarmingly, this proposal’s additional removal of at least 57 mature trees will further accelerate canopy decline, undermining Council’s targets and policies aimed at protecting and expanding urban forest cover.

Prioritising Profits Over Environmental and Community Benefits

Sadly, it appears this development places developer profits ahead of protecting native wildlife, flora, and fauna, sacrificing the irreplaceable amenity of mature trees. These trees provide natural cooling, carbon sequestration, air purification, and stormwater absorption — all essential to the health, comfort, and resilience of the community, including current Jardin residents. Approving this loss undermines both local and state objectives for climate adaptation and sustainable urban environments.

During the first Jardin development (7 Skyline Place) and the second expansion (5 Skyline Place), this community has personally witnessed the widespread removal of mature tree canopy — a devastating and ongoing experience. This destruction continues to this day, with additional trees removed as recently as Saturday 29 June 2025, highlighting the relentless and ongoing loss of green cover caused by the Jardin developments.

Construction Impacts and History of Breaches

During the first Jardin development, uncontrolled concrete dust contamination during demolition resulted in carcinogenic dust settling on nearby homes, including my own.

The situation became so severe that the developers were forced to pay for property clean-ups and the site was shut down following widespread community concern.

This experience left residents distressed and highlighted serious shortcomings in construction oversight.

While the Construction Management Plan for this proposal (p.5–6) sets out standard construction hours, it lacks enforceable commitments, proactive dust monitoring, or independent compliance measures, leaving residents at risk of enduring the same breaches and health hazards experienced during the previous development.

Given the alarming health impacts suffered by the community during the first Jardin construction, I urge the NSW Planning Panel to require comprehensive, enforceable safeguards — including real-time dust monitoring, independent compliance audits, and a clear complaints resolution process — to protect residents' health and wellbeing during any future works.

Building Height and Scale

The proposed towers, reaching up to 14 storeys, far exceed the established 1–2 storey character of surrounding residential areas and even surpass the 6–8 storey heights recently approved nearby.

The developer's own Visual Impact Assessment concedes the project will result in *"moderate to high magnitude changes"* and adverse impacts on highly sensitive residential views. Planning principles require compatibility with existing neighbourhood character — a standard this proposal clearly fails to meet.

When the second Jardin development at 5 Skyline Place was assessed, Northern Beaches Council's Assessment Report found that a proposed height of 12 storeys (up to 39 metres) was already excessive, out of character with the business park, and highly visible from surrounding low-density residential areas. The report explicitly stated:

"The proposed development with a height of 12 storeys, and up to 39m, is excessive in height and out of character with the business park. It will be readily viewed from the nearby R2 Low Density Residential area to the north and from distant areas outside the business park. It will set an undesirable precedent for similar height and scale of development across the business park..." (SNPP Assessment Report, Executive Summary, p.2)

This reasoning led Council to recommend refusal of the second Jardin development on the basis of height, bulk, and character incompatibility. These concerns apply even more strongly to the current proposal, which exceeds the previously rejected height with buildings up to 14 storeys.

Furthermore, when the developers first proposed earlier Jardin projects, the community's response was one of overwhelming objection, with 23 submissions received for DA2021/0212 alone, citing excessive height, incompatibility with local character, and impacts on views and privacy. This shows widespread resident opposition to oversized towers in this location, reinforcing that the current proposal is fundamentally out of step with community expectations.

The proposal's unprecedented scale ignores the need for appropriate height transitions to surrounding low-rise homes and the broader objective of maintaining a harmonious, human-scale built environment, making it incompatible with the character of Frenchs Forest.

Planning Inconsistencies and SP4 Zoning Contradictions

The Environmental Impact Statement cites the Frenchs Forest 2041 Place Strategy to justify height and scale, yet provides no evidence that prior plans supported large-scale residential redevelopment east of Wakehurst Parkway.

Historical plans and Council's own statements instead indicated that this area could not support high-density development. Council has formally objected to similar proposals, citing inconsistency with SP4 zoning and adopted strategic planning frameworks.

Waste Management After Hours

The Operational Waste Management Plan makes no commitment to restricting garbage collection to standard hours, allowing the possibility of noisy waste trucks operating during early mornings or late nights, which would significantly disrupt residents' sleep and amenity.

Community Opposition

The developer's own Engagement Report documents widespread community concerns about traffic, parking, ecological loss, excessive height, and construction impacts. These are not isolated fears but shared by many residents.

Northern Beaches Council's assessment report for the second Jardin development also documented 23 similar community submissions, underscoring the depth and consistency of local opposition to oversized developments at Skyline Place.

Evidence from Previous Planning Panel Decisions and Council Reports

The Sydney North Planning Panel unanimously refused the second Jardin development at 5 Skyline Place in August 2021, citing excessive height and bulk, incompatibility with planning controls, and loss of employment lands. These are all issues even more pronounced in the current proposal for 1–3 Skyline Place!

Northern Beaches Council's assessment report supported this refusal, highlighting fundamental inconsistencies with strategic plans and SP4 zoning objectives.

Despite these well-founded rejections, the developers proceeded to secure approval through the Land and Environment Court, effectively bypassing Council decisions and overwhelming community objections.

This pattern of developers seeking approval through the Land and Environment Court consistently undermines public confidence in the planning system, sending a clear message that community voices and strategic planning controls can be disregarded if developers are willing to pursue costly legal appeals. Such practices discourage residents from participating in the consultation process, like this one, as many feel their submissions are ultimately futile when developers can chase approval through the courts until they prevail, as will undoubtedly be the case with this third Jardin development if their development application is rejected.

Contradictions with Frenchs Forest 2041 Place Strategy

The Frenchs Forest 2041 Place Strategy, developed to guide the long-term growth of Frenchs Forest into a vibrant, sustainable, and well-integrated health, education, and employment precinct, while ensuring compatibility with surrounding neighbourhoods, directly conflicts with this proposal. The Strategy clearly calls for:

- Height limits stepping down near low-density homes, which this proposal violates with towers up to 14 storeys;
- Intensification only within the defined town centre — Skyline Place lies outside this boundary;
- Strengthening the business park as a health and employment precinct — not replacing industrial land with residential towers;
- Protecting green streets and achieving a 30% canopy target — directly contradicted by the large-scale tree removal proposed.

This development doesn't meet the detailed and well-researched outcomes of the Place Strategy, nor is it in line with the considerable public consultation and feedback sought during the Place Strategy planning process.

Affordable Housing Provision

The Environmental Impact Statement and Social Impact Assessment confirm that the proposal includes approximately 200 Independent Living Units (ILU) in Stage 1, with only 5% of ILU Gross Floor Area designated for affordable housing. That's roughly 10 affordable units, locked in for just 15 years, with no details provided on affordability standards, rent levels, or eligibility criteria.

This minimal, temporary contribution falls far short of key affordable housing requirements:

- The NSW Housing SEPP specifies a minimum of 10% GFA dedicated to affordable housing to qualify for incentives, a threshold this proposal does not meet.
- The Northern Beaches Council Affordable Housing Policy similarly sets a target of 10% affordable rental housing in all strategic plans and planning proposals.

Given the urgent need for affordable seniors housing on the Northern Beaches, where many older residents face housing stress or homelessness, this token offer of temporary affordable housing fails to meet either state or local policy objectives. It does not meaningfully contribute to addressing the region's affordable housing crisis.

Moreover, this underscores that the proposal offers virtually no significant benefit to the broader Northern Beaches community, as it primarily caters to a narrow segment of wealthy seniors able to afford high-end independent living, while providing almost nothing for the many residents in genuine need of affordable options.

Conclusion

The proposed development's excessive scale, failure to respect local character, permanent loss of employment land, inadequate affordable housing, significant ecological impacts, and failure to credibly mitigate construction and traffic effects, mean it will have enduring negative impacts on existing residents and the wider community.

As a resident who will be directly affected by the proposed development, I have a personal interest in this matter; however, as a small business owner and advocate for small business diversity on the Northern Beaches, developments such as this are deeply alarming.

As a member of the Northern Beaches Business & Industry Stakeholder Committee, I am acutely aware of the challenges to employers and workers in the area. These include limited local employment opportunities, workers commuting outside the area (increasing congestion), and the urgent need to protect industrial and business land to sustain economic diversity.

The Stakeholder Committee's role is to provide a high-level industry forum to understand changing economic and business needs across the Northern Beaches, monitor delivery of the Economic Development Strategy and Destination Management Plan, and provide strategic input on:

- Local economic conditions and business confidence;
- Emerging industry trends and opportunities;
- Business programs and grant funding opportunities;
- Progress towards meeting targets in strategic plans.

Approving a development of this scale, which removes scarce employment lands and replaces them with oversized residential towers outside the defined town centre, directly undermines these strategic goals. Economic diversity is limited further, forcing more residents to commute, and eroding the foundation of a sustainable local economy.

Importantly, this proposal offers little back to the broader Northern Beaches community. Instead of delivering benefits, it takes away valuable job diversity, green space, and mature trees, while adding significant problems in the form of increased parking pressure, traffic congestion, and further strain on local infrastructure. These costs will be borne not just by immediate neighbours, but by the entire Northern Beaches community for decades to come.

I strongly urge the Department of Planning and Northern Beaches Council to refuse this proposal in its current form.

If you would like copies of historic documents referenced in my submission, these can be provided upon request.

Thank you for considering this submission.

Kind regards,

Rebecca Mitchell
Northern Beaches Resident and Small Business Owner