



RSL LifeCare Montgomery Centre

External Alterations and Additions to Seniors Living Development

Prepared for RSL Lifecare

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planning&co

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This document is a draft for discussion purposes only unless signed and dated by the persons identified.

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1.0 Introduction

This Statement of Environmental Effects (**SEE**) has been prepared by Planning & Co on behalf of RSL Lifecare Limited (ABN 43 000 048 957) (**Proponent**) in support of a development application (**DA**) for external building and services upgrades and improvements, landscaping works and amendments to the existing parking layout to the Montgomery Centre, within the RSL ANZAC Village (**Village**) at 4 Colooli Road, Narrabeen (**site**). No internal changes are proposed to the Montgomery Centre.

Specifically, the development application seeks approval for the following:

- Demolition of several existing structures including a small ancillary ‘IT building’ and existing private bus shelter that is no longer required.
- Upkeep and upgrade works to existing services, including replacement of mechanical condensers located to existing roof structure.
- Demolition of a decommissioned pump room (fire booster set), which is no longer required as these pumps have been replaced by a new booster and fire storage tank approved under DA 2022/1433.
- Refurbishment and replacement of an existing external stage used by the Village for outdoor RSL services, including associated retaining walls and landscaping.
- Reconfiguration of the existing parking layout to consolidate car parking locations and the provision of an additional 5 net parking spaces to suit the operational needs of the Village, it’s residents and visitors.
- The construction of accessible paths connecting the Montgomery Centre to other parts of the Village including new landscaped areas, Edmondson Drive, the Terrace building, the Village OpShop and additional on-site parking.
- Landscaping works and additional planting.

This SEE is supported by the following technical reports and additional information as appendices.

Table 1: List of Appendices

Appendix	Document	Author
A	Owner’s Consent	Proponent
B	Survey Plan	Bee & Lethbridge
C	Architectural Plans	McNally Architects
D	Landscape Plans	Group GSA
E	Bushfire Advice	Building Code & Bushfire Hazard Solutions
F	Access Report	Funktion
G	Demolition Plan	McNally Architects
H	Stormwater Management Plan	McNally Architects
I	Stormwater, Sediment and Erosion Control Plan	TTW
J	Mechanical Condenser Unit Specifications	JHA Engineers
K	Arborist Report	Creative Planning Solution
L	Waste Management Plan	McNally Architects
M	Cost Summary Report	MBM

The proposed development is entirely appropriate for the site in terms of the matters for consideration under Section 4.15(1) of the EP&A Act, will enable the ongoing operational activities of the Village and provide greater accessibility and comfort for residents and visitors to the Montgomery Centre. Accordingly, the development application for the proposed works is supported and approval is recommended.

2.0 Site Analysis

2.1 RSL ANZAC Village

The RSL ANZAC Village (**Village**) is located at 4 Colooli Road, Narrabeen and provides residential aged care for more than 300 residents. The Village contains a number of buildings that are ancillary to seniors housing, including the Montgomery Centre. The Village extends across several lots as shown in **Figure 1**.

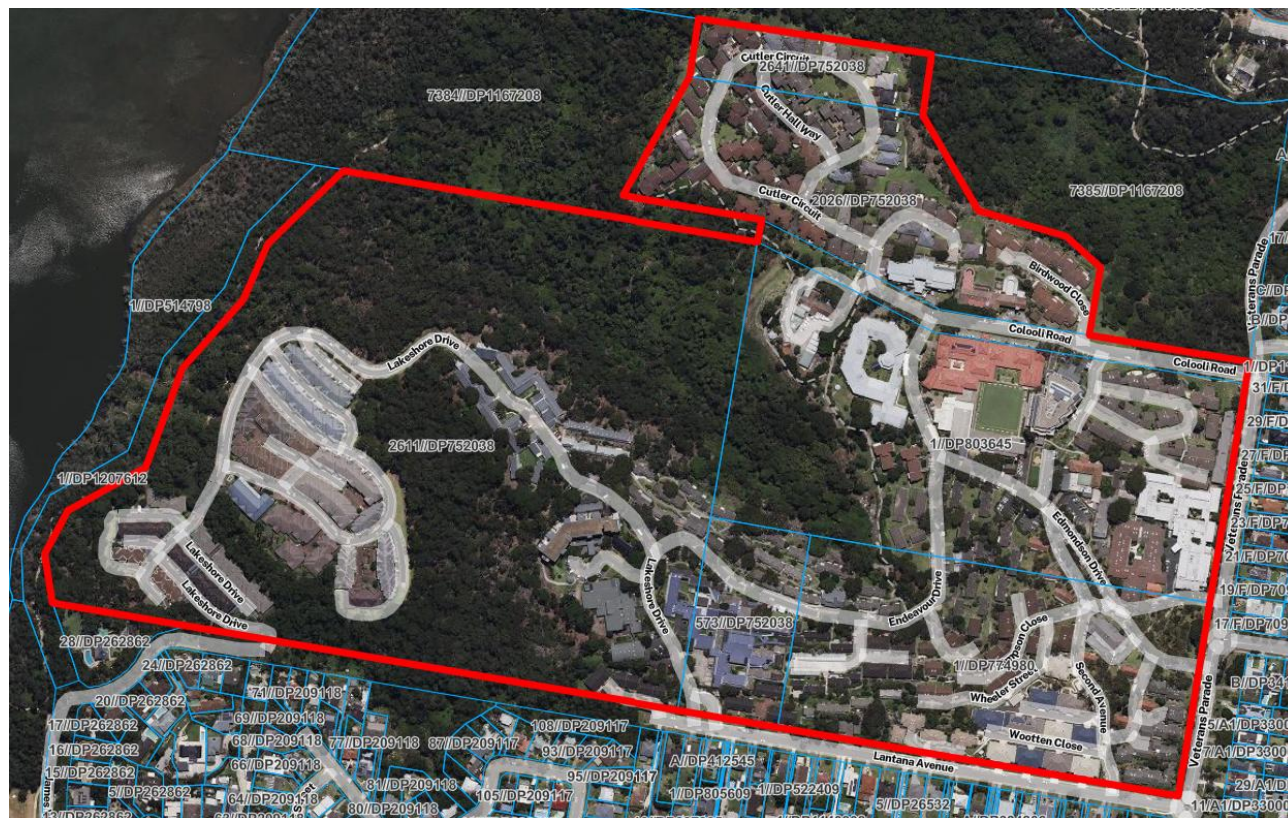


Figure 1: RSL Anzac Village (red outline)

Source: NSW SDT Viewer

2.2 The Site

The 'site' for the purposes of this DA is the Montgomery Centre, including external landscaping and car parking. The Montgomery Centre is within Lot 1 of DP 803645, shown yellow in **Figure 2**. The Montgomery Centre and surrounding landscaped area and car parking is identified in **Figure 3**, shown blue.

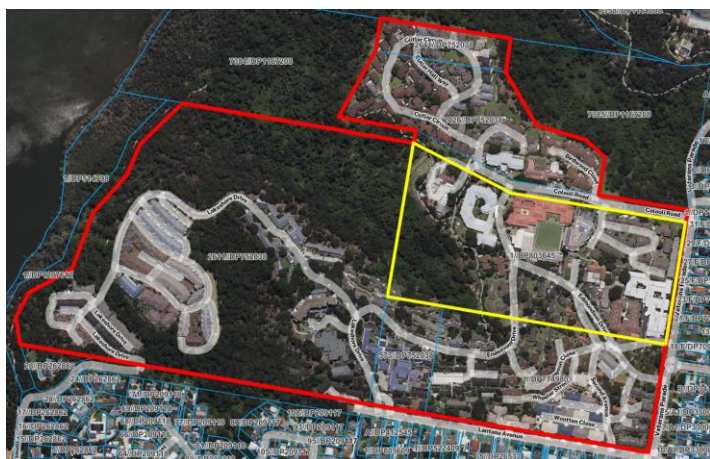


Figure 2: Lot 1 DP 803645

Source: NSW SDT Viewer



Figure 3: Montgomery Centre (blue outline)

Source: NSW SDT Viewer

2.3 Existing Development

The Montgomery Centre is an existing ‘hall-style’ building used for events, indoor recreation and other uses by residents and visitors to the Village. The primary access and egress point to the Montgomery Centre is from Endeavour Drive, which runs approximately north-west against the site. A secondary point of access is from the corner of Endeavour Drive and Edmondson Drive, and is a narrow staircase adjacent services at ground level.

The Montgomery Centre and surrounding structures relevant to this DA are identified in **Figure 4**. Individual buildings and structures are further identified and described as required throughout this SEE.

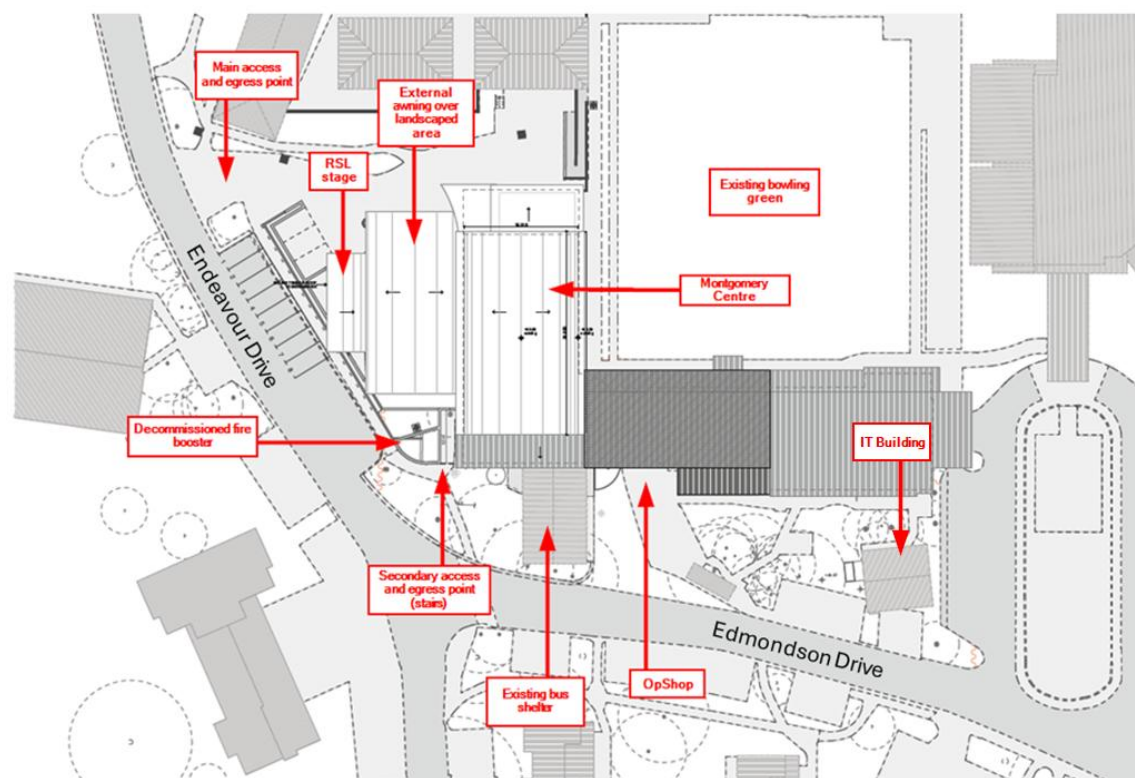


Figure 4: Existing Development and Site Context

Source: McNalley Architects, Planning & Co.



Figure 5: Primary Access and Egress
Source: Google Maps



Figure 6: Secondary Access and Egress
Source: Google Maps

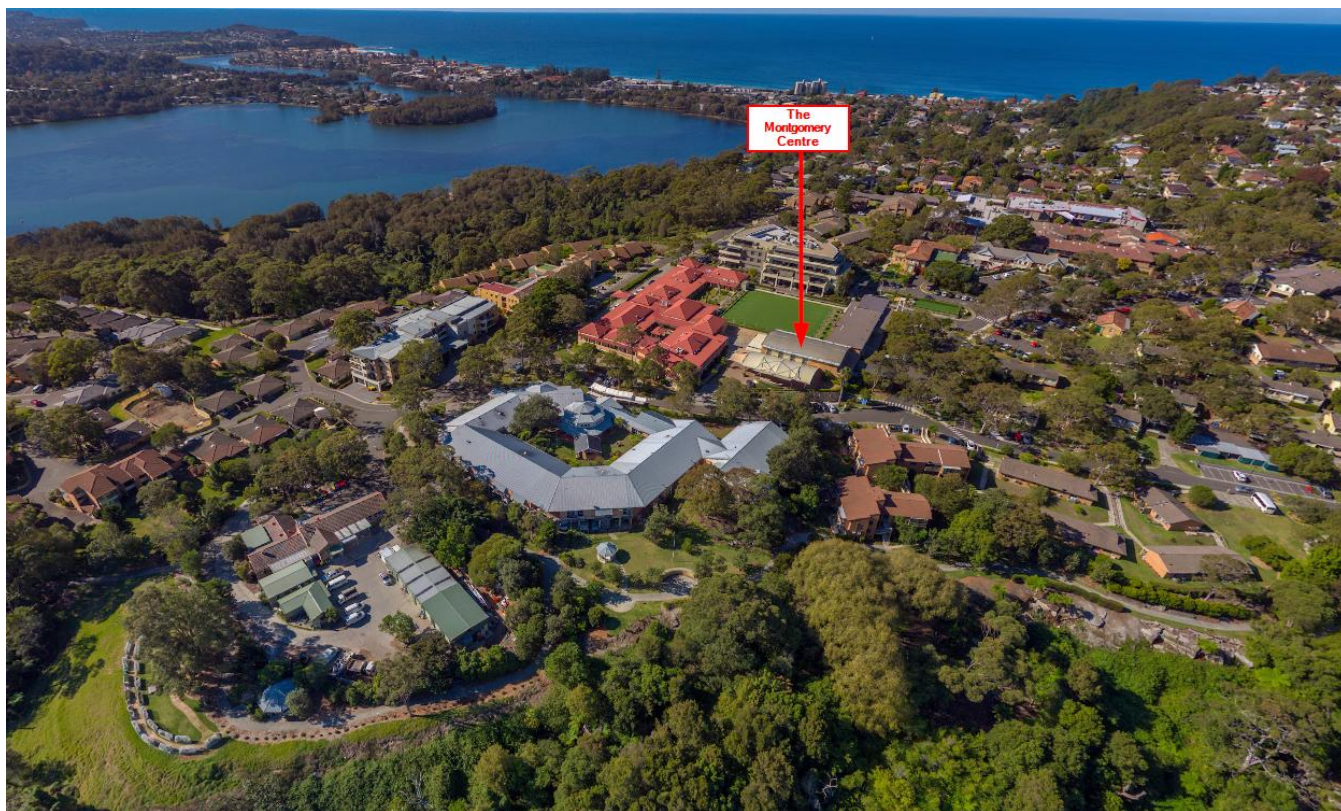


Figure 7: Aerial view of the site looking east
Source: Google Maps



Figure 8: Aerial view of the site looking south
Source: Google Maps

3.0 Description of Proposed Development

3.1 Overview of Proposed Works

This development application seeks approval for building and services upgrades and improvements, landscaping works and amendments to the existing parking layout to the Montgomery Centre. The application also seeks approval for the demolition of some existing structures, including a private bus shelter, no-longer-required I.T. infrastructure and a decommissioned fire booster. The proposed works are proposed to improve the accessibility, circulation, function and efficiency of the Centre. No internal changes are proposed to the Montgomery Centre.

Specifically, the development application seeks approval for the following works as summarised in **Table 2**, which is to be read in conjunction with the technical inputs, architectural drawings and landscaping plans provided as appendices to this SEE.

Table 2: Proposed Works Summary

Proposed Works	Particulars
Demolition	Demolition of the following structures is proposed: <ul style="list-style-type: none"> Existing bus shelter, IT Building, Decommissioned fire booster, Existing paths as shown on demolition plan prepared by McNalley Architects and attached as Appendix G.
Upkeep and upgrade works to services	Replace mechanical condensers on the southern roof of the Montgomery Centre and provide louvred screens to south and west to conceal unit.
Replace external RSL Stage	Replace and Refurbish the existing RSL stage located adjacent the Montgomery Centre to the west, to include new ANZAC signage, sandstone finishes, steps and handrails. Works will include the reconstruction of minor retaining walls.
Reconfiguration of parking layout	Reconfigure the existing parking layout surrounding the Montgomery Centre to consolidate car parking locations. The reconfiguration will result in an additional 5 net parking spaces, with 7 parking spaces added and two existing parking spaces removed. The reconfiguration of a small bay of parking adjacent the main entry to the Centre will include minor retaining works and additional landscaping.
New accessible path connections	Provide new paths connecting the Montgomery Centre to other parts of the Village including new landscaped areas, Edmondson Drive, the Terrace building, the Village OpShop and additional on-site parking. Paths are shown in the Architectural Drawing set prepared by McNally Architects and attached as Appendix C .
Landscaping Works	Landscaping works to the areas surrounding Montgomery Centre including under the external awning attached to western façade of the Centre. Refer to the Landscape Drawings prepared by Group GSA and attached as Appendix D .

3.2 Updated Scope of Works

During design development, the following minor amendments have been made to the above scope of works. Refer to the updated Architectural Drawings prepared by McNally Architects with regard to revision cloud references.

- Revision Cloud 1 = Deletion of previously proposed mechanical exhausts stacks (x2), condenser platform, and access ladder.
- Revision Cloud 2 = Previously proposed platform for mechanical condensers shifted from west to east. Louvred screen to conceal condensers added to south and west facing side of platform.
- Revision Cloud 3 = Stairs increased width and the ramp moved next to the existing building.
- Revision Cloud 4 = Parking near the Memorial Stage and planter walls design amendments.
- Revision Cloud 5 = View of southern side of hall shows of deletion of previously proposed mechanical exhausts stacks (x2), platform, and access ladder. Louvred screen to conceal condensers platform can be seen.
- Revision Cloud 6 = Finishes materials added
- Revision Cloud 7 = Previously Anzac memorial was demolished. New proposal to retain the existing Anzac memorial and extend as represented in the proposed plans.

- Revision Cloud 7 = The external paint specification for Columns between doors to existing external: similar to existing colour.

3.3 Estimated Development Cost

The estimated development cost for the proposed development is \$1,394,828.19. A Cost Summary Report has been prepared by MBM and is attached as **Appendix M**.

3.4 Demolition and Excavation

The proposed development includes the demolition of a bus shelter used by the Village to park small private buses used to transport residents, an 'IT building' and a decommissioned fire booster, that has been relocated to allow for a more cohesive landscaping approach and better access to the Montgomery Centre. Existing paths and other minor ancillary structures are also proposed to be demolished the lower ground and upper ground levels as shown in the demolition plan as part of **Appendix G** and **Figure 9**.

The external memorial stage is not proposed to be demolished and works are remedial or refurbishment only.



Figure 9: Demolition Plan, lower ground (left) and upper ground (right)

Source: McNally Architects

Architectural Design & Materials

3.5 Landscaping

A landscaping plan has been prepared by Group GSA and is attached as **Appendix D**. The proposed landscaping works includes gentle pathways and earthworks to improve the sites accessibility within its context as a Seniors Living development. Planting and vegetation has been carefully selected to complement the existing character and garden-nature of the Village.

3.6 Parking and Access

The proposed development seeks approval to relocate a small number of internal car parking spaces surrounding the Montgomery Centre, with seven additional car parking spaces proposed, and two existing spaces being removed. Proposed amendments to the parking layout is summarised in **Figure 10**.



- Zone 1: reconfiguration of the drop-off and accessible car spaces (1 parking removed)
- Zone 2: Add 6 new car spaces adjacent the fire booster to be demolished as clearance/access no longer required. (6 new parking)
- Zone 3: Reconfiguration of existing layout (1 parking removed, 1 added)
- Zone 4: Car spaces moved towards the road to facilitate pedestrian path creation. (no additional or removed parking)
- Zone 5: Demolition of the existing bus parking underneath bus shelter.
- Zone 6: Add parking space

Figure 10: Proposed Parking Amendments

Source: McNally Architects, Planning & Co.

4.0 Assessment of Environmental Impacts

4.1 Matters for Consideration

Section 4.15 of the Environmental Planning and Assessment Act. 1979 requires a consent authority to take into consideration the below matters when determining a development application;

- Any environmental planning instrument, and
- Any proposed environmental planning instrument that has the subject of public consultation, and
- Any development control plan, and
- Any planning agreement entered into under section 7.4 of the Act, and
- The regulations

4.2 Integrated Development

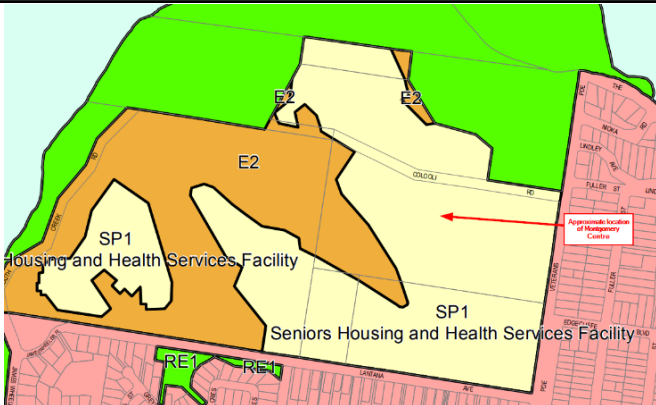
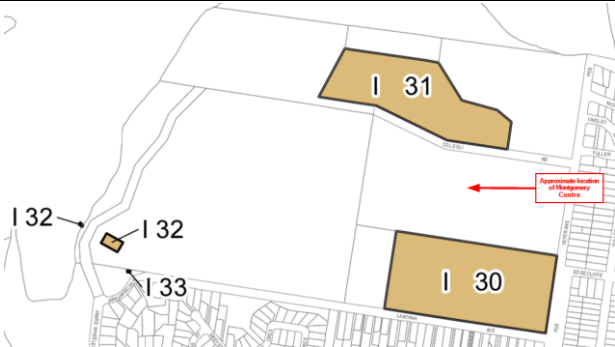
The subject site is mapped as being bushfire prone and the proposed development pertains to a retirement village, which is a special fire protection purpose within meaning of the Rural Fires Act 1997.

Consequently, the application constitutes integrated development pursuant to Division 4.8 of the Environmental Planning and Assessment Act 1979. It is noted that the NSW Rural Fire Service have issued General Terms of Approval and Bushfire Safety Authority on 14 April 2025.

4.3 Warringah Local Environmental Plan 2011

The Warringah Local Environmental Plan (**LEP**) 2011 is the primary environmental planning instrument that applies to the site. The proposed works are assessed against relevant LEP considerations in **Table 3**.

Table 3: LEP Assessment

Clause	Control	Assessment
Land Use Zone		
SP1 Special Activities Zone	 <p>Figure 11: SP1 Zone & Approximate Site Location Source: WLEP Land Zone Map, Planning & Co.</p> <p>1 Objectives of zone</p> <ul style="list-style-type: none"> To provide for special land uses that are not provided for in other zones. To provide for sites with special natural characteristics that are not provided for in other zones. To facilitate development that is in keeping with the special characteristics of the site or its existing or intended special use, and that minimises any adverse impacts on surrounding land. <p>...</p> <p>3 Permitted with consent Aquaculture; Environmental protection works; <u>The purpose shown on the Land Zoning Map, including any development that is ordinarily incidental or ancillary to development for that purpose</u></p> <p>4 Prohibited Any development not specified in item 2 or 3.</p>	<p>The site is zoned SP1 Special Activities – Seniors Housing and Health Services Facility. Development for the purposes of seniors housing and health services facilities are permitted in the zone.</p> <p>The proposed development meets the objectives of the zone and it will continue the special land use at the site and facilitate development that is in keeping with the natural and special characteristics of the site and its existing use. The proposed development is also not anticipated to have any adverse impacts on surrounding land.</p> <p>The proposed development is permitted in the SP1 Zone. The Montgomery Centre is ancillary to Seniors Housing at the site. The proposed development does not rely upon existing use rights. No new uses are proposed as part of this DA.</p>
Height of Building	There is no height control that applies to the site.	
Floor Space Ratio	There is no FSR control that applies to the site.	
Heritage Conservation	 <p>Figure 12: Heritage Items and the Site Source: WLEP Heritage Map, Planning & Co.</p>	<p>The site is not identified as a heritage item and it not within a heritage conservation area.</p> <p>The site is proximate two heritage items of local significance within the RSL Village; Items I30 “Anzac War Memorial” and I31, “Building known as Legacy Park”</p> <p>The proposed works are not expected to impact on either heritage item within the Village site.</p>

Landslide Risk

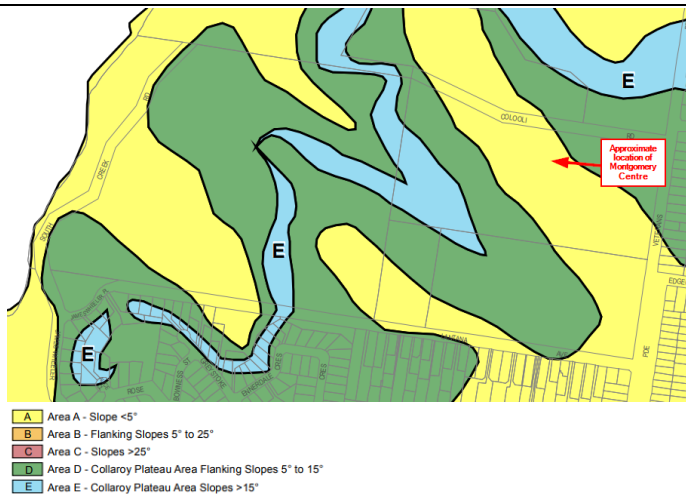


Figure 13: Landslip risk and the Site

Source: WLEP Landslip Risk Map, Planning & Co

S6.4 Development on sloping land

(3) Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that—

- (a) the application for development has been assessed for the risk associated with landslides in relation to both property and life, and
- (b) the development will not cause significant detrimental impacts because of stormwater discharge from the development site, and
- (c) the development will not impact on or affect the existing subsurface flow conditions.

The site is identified on the Landslide Risk map.

The proposed works are minor in nature and are not expected to impact or create any additional landslip risk in relation to property or life.

A stormwater management plan and erosion and sediment control plan has been provided as **Appendix H**. The report demonstrates that the proposal will not cause significant detrimental impacts because of stormwater discharge, and that the development will not impact on or affect the existing subsurface flow conditions.

4.4 Warringah Development Control Plan 2011

The Warringah Development Control Plan (DCP) 2011 applies to the Site. The proposed works relate to general building and site improvements, parking and demolition to an 'internal' part of the Village. Therefore, the impacts of the proposed development on neighbours is expected to be negligible. An assessment against the DCP is provided in the **Table 4**, mindful of this context and noting that a DCP is not a statutory instrument and per s3.42 of the EP&A Act, its role is to give effect to the aims of environmental planning instruments, facilitate permissible development and achieve the objectives of the land zone.

The DCP also recognises the unique considerations of the RSL Village with regard to site coverage, setbacks and wall heights, which per DCP Part B, are mapped as being either merit-based or not applicable.

Table 4: DCP Compliance Assessment

Clause	Complies	Comment
A.5 Objectives	Yes	The proposed development meets the objectives of the DCP and responds to the characteristics of the site, creates a unified landscape, provides a high level of access to and within development and achieves environmentally, economically and socially sustainable development within Warringah.
C2 Traffic, Access and Safety	Yes	The proposed amendments to the parking layout of the Montgomery Centre will have no impact on kerbside or 'on street' parking, traffic hazard or vehicle queuing on public roads, and meets the objectives of DCP C2.
C3 Parking Facilities	Yes	The proposed development will ensure that adequate off street parking is provided to the Montgomery Centre.
C4 Stormwater	Yes	The proposed is supported by a stormwater management plan and the stormwater system will be designed, installed and maintained in accordance with Council requirements and will have minimal environmental impact.
C7 Excavation and Landfill	Yes	Excavation and any fill used as part of the proposed development will not result in any adverse impacts on adjoining land and will be constructed to ensure geological stability. It is not anticipated that the minor excavation proposed will have any adverse effect on the visual or natural environment.
C8 Demolition and Construction	Yes	Proposed excavation and construction will be managed so that there is no unreasonable impact on the surrounding amenity, pedestrian or road safety, or the natural environment.
C9 Waste Management	Yes	The proposed development will minimise any adverse environmental impacts associated with the storage and collection of waste. A Waste Management Plan supports the development application and is attached as Appendix L .
D20 Safety and Security	Yes	The proposed development will have a beneficial impact on the safety and security of the Montgomery Centre by providing better overlook to and entry from the street.
D21 Provision and Location of Utility Services	Yes	The proposed development will improve the land and cost efficiency of utility services at the site.
D22 Conservation of Energy and Water	Yes	The proposed development will improve the layout and orientation of landscaping and minimise energy and water consumption.
E1 Preservation of Trees or Bushland Vegetation	Yes	The proposed development will not impact on the preservation of bushland vegetation proximate the site and is supported by an Arborist Report attached as Appendix K .
E3 Threatened Species	Yes	No threatened species are anticipated to be affected by the proposed development.

E10 Landslip Risk	Yes	The proposed development includes external works only and is not anticipated to impact on the geotechnical stability of the site. Earthworks and demolition undertaken will be carried out in accordance with good engineering practice and will not cause detrimental impacts because of stormwater discharge or subsurface flow conditions.
E11 Flood Prone Land	Yes	The Montgomery Centre is not on flood prone land.
F3 SP1 Special Activities	Yes	The proposed development will continue the permitted land use within the SP1 zone. The proposed development will enable the protection and enhancement of the natural landscape and will not create any buildings that dominate long distance views of the area.
War Veterans Village, Narrabeen	Yes	<p>The War Veterans site will continue to provide housing for older people and associated uses to meet the needs of residents within the locality.</p> <p>The proposed development does not include any buildings above the predominant tree line when viewed from the Narrabeen Lagoon viewing catchment. The proposed development includes landscaping and colours that are in keeping with the existing site. Landscaping works will have no impacts on the Narrabeen Lagoon viewing catchment area.</p> <p>Bushfire hazard reduction measures and stormwater detention required as a result of development will be contained within the site, and the proposed development is supported by bushfire advice and a stormwater management plan.</p>

5.0 Environmental Assessment

5.1 Built Form

The proposed built form is in keeping with the existing character of the Village and will have no adverse impacts on neighbouring development. The proposed development seeks approval for general improvements and renewal of an existing ancillary building within the Village and does not propose any new additional dwellings or floor space.

5.2 Traffic and Parking

The proposed development includes the reconfiguration of existing parking surrounding the Montgomery Centre to better suit the operational needs of the Village, residents and visitors. As part of the landscaping works, two car parking spaces will be removed and seven new parking spaces will be added, representing a net gain of 5 car parking spaces. All parking spaces are internal to the Village and no changes to any on-street parking near the site is proposed.

These new parking spaces are not anticipated to have any adverse impact on internal or public road function and will provide greater accessibility and access to the Montgomery Centre for residents and visitors. It is not anticipated that the proposed additional five parking spaces will have any adverse impact on traffic in Narrabeen or the Northern Beaches LGA.

5.3 Access and Egress

The proposed development will greatly improve access and egress to the Montgomery Centre, replacing inaccessible, steep and narrow existing external stairs with gentle, ambulating and visually interesting pedestrian pathways. The access and egress points to the Centre will be integrated into landscaping works and maintain and enhance the natural setting of the Village. An access report supports the proposed development and is included as **Appendix F**.

5.4 Stormwater

A stormwater management plan has been prepared by McNally Architects, and concludes that the external impervious areas will not increase and there are no changes to the existing buildings or roofs, the post development flows will match the pre-development flows, and detention of stormwater is not required. To control any potential pollutants, 'Ocean Guards' will be installed in all proposed stormwater pits.

Erosion and sediment control measures have also been prepared for the site during construction.

5.5 Bushfire Risk

The site is identified as within Vegetation Category 1 and the Vegetation Buffer per Council's bushfire land mapping and is therefore considered to be bushfire prone land. Bushfire advice supports the proposed development and is included as **Appendix E**, and finds that the proposed development is of minor bushfire risk, and that landscaping has been designed and managed to minimise flame contact and radiant heat to buildings.

It is not considered that the proposed development will have any adverse impact on the safety of residents or visitors and the bushfire risk at the site will not be impacted by proposed works.

5.6 Landscaping

The proposed development includes landscaping improvements to the land surrounding the Montgomery Centre. A landscaping plan prepared by Group GSA supports the development and is included as **Appendix D**. Proposed landscaping will include native planting and will be integrated into the existing Village landscaping.

5.7 Tree Removal and Retention

The Montgomery Centre Site and the Village more generally benefits from extensive tree canopy coverage and deep soil planting. The proposed development will maintain and enhance the natural setting of the Montgomery Centre and where possible will maintain existing trees proximate the site. An arborist report has been prepared and is included as **Appendix K**.

There are forty-two (42) trees in the vicinity of the site as identified in the arborist report. Thirty-two (32) predominantly medium and high retention value trees will be retained. Ten (10) trees are proposed to be removed, including one (1)

tree of high retention value. The arborist report notes that this tree, a Sydney Red Gum is likely to suffer loss of roots from excavation that would cause a decline in the health and condition of the tree, and that removal of the tree is required in order to facilitate development.

5.8 Suitability of the Site for the Development

The site is entirely suitable for the proposed development. The proposed development is permitted in the SP1 Zone and satisfies the zone objectives as well as the objectives of the DCP.

5.9 Public Interest

The proposed development is in the public interest and will have no adverse impact on neighbouring development or surrounding environment. The proposed development will ensure the Montgomery Centre remains fit for purpose and can support the needs of residents and visitors to the RSL Village.

6.0 Conclusion

This SEE has been prepared by Planning & Co in support of a development application for building and services upgrades and improvements, landscaping works and amendments to the existing parking layout to the Montgomery Centre, within the RSL ANZAC Village at 4 Colooli Road, Narrabeen. The proposed development is considered entirely appropriate for the site and is permitted with consent in the SP1 Zone. The proposed development is:

- Consistent with the objects of the Environmental Planning and Assessment Act 1979
- Consistent with the SP1 Zone objectives of the LEP
- Consistent with the aims of the LEP
- Consistent with the objectives of the DCP

It is considered that the proposed development satisfies the appropriate development standards and controls applying to the site and is in the public interest. The proposed development is not anticipated to have any adverse impacts on neighbouring development and approval is recommended.