

3 November 2025

Department of Planning, Housing and Infrastructure
Major Projects Team

Subject: Submission on SSD-7622 – Indigo by Moran, 156 Ocean Street, Narrabeen

Dear Assessors,

I am writing as a resident and community member within the Northern Beaches LGA to provide a formal submission regarding the proposed Indigo by Moran State Significant Development (SSD-7622) at 156 Ocean Street, Narrabeen.

While I acknowledge the importance of providing quality seniors housing, I am concerned that the current proposal — including a 6-storey apartment complex in a predominantly low-rise coastal setting — is inconsistent with the local built form, established character, and strategic planning intent of Narrabeen.

1. Height, Scale and Local Character

The proposal seeks approval for a six-storey development in a locality that is overwhelmingly characterised by low-rise residential buildings, typically two to three storeys. The resulting height, bulk and massing would:

- Visually dominate the coastal streetscape and alter the established low-scale coastal character that defines Narrabeen.
- Create an overbearing built form inconsistent with the intent of the Northern Beaches Local Environmental Plan (LEP) height controls for this precinct.
- Set a precedent for further high-rise redevelopment in a sensitive, low-density coastal area.

The Environmental Impact Statement (EIS) does not adequately demonstrate how the proposed height aligns with or enhances the existing built environment. The justification offered — primarily that the development provides seniors living — does not, in itself, warrant such a substantial departure from the prevailing height and scale that local planning instruments have long sought to preserve.

2. Visual, Amenity and Environmental Impacts

Given the site's proximity to Narrabeen Lagoon and the coastal strip, the proposed scale raises additional concerns including:

- Potential visual intrusion into the coastal and lagoon landscape.
- Overshadowing of neighbouring properties and public spaces.
- A loss of the open, low-rise skyline that contributes to the area's distinctive seaside character.

The EIS should provide a more rigorous visual impact and view-loss assessment, including photomontages from key public vantage points (such as Ocean Street, Lagoon Street and the coastal walkway) to fully illustrate the change in character and amenity.

3. State Significance and Planning Context

It is unclear how this project meets the criteria of State Significance under Schedule 2 of the State Environmental Planning Policy (Planning Systems) 2021, beyond its capital investment value. The issues raised are local in character and impact, and could be appropriately managed under the Northern Beaches Council's development assessment framework.

The State Significant Development pathway should not be used to circumvent local planning controls or community consultation processes, particularly where the primary concern is height and visual impact within a clearly defined low-rise neighbourhood.

4. Requested Outcome

I respectfully request that the Department:

1. **Refuse the application** in its current form on the grounds of excessive height, bulk, and inconsistency with local character; **or**,
2. Require significant redesign to ensure the proposal better reflects the surrounding built form — including reduced building height, greater setbacks, stepped massing, and enhanced landscaping to soften its visual prominence.

Should approval be contemplated, I also request that strict conditions be imposed to protect local amenity, view corridors, and the overall low-rise character of Narrabeen.

In summary, the Indigo by Moran proposal presents an over-scaled development that is incompatible with the coastal village character and planning intent of Narrabeen. I urge the Department to ensure that any redevelopment of this site respects the community's expectations for a low-rise, environmentally sensitive, and contextually appropriate outcome.

Thank you for considering this submission.

Yours faithfully,

Concerned resident

Bayview NSW 2104