

I wish to lodge my objection to the proposed Moran development at 156 Ocean St and raise the following items of concern for the planning authorities consideration:

1. Incompatibility with Local Character and Built Form

The proposed development is fundamentally at odds with the established character of the surrounding area, which is predominantly comprised of single and two-storey residential dwellings, and low-rise residential flat buildings of two to three storeys.

Introducing a five-storey structure with three basement levels represents an excessive and inappropriate scale, bulk, and intensity. The proposed height and massing are inconsistent with the existing built form and disrupt the visual cohesion and human scale of the streetscape. This development would dominate its surroundings, interrupt the natural transition between buildings, and erode the established residential character—contrary to the planning objectives for the zone.

2. Breach of Height Controls

The proposed building height of 21.1 metres exceeds the permissible limit by 8.8 metres, even when accounting for allowances under the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004.

This significant non-compliance:

- Constitutes an unjustified breach of planning controls,
- Results in substantial visual intrusion and loss of views, and
- Undermines the integrity of the local planning framework.

The excessive height leads to unreasonable overshadowing and bulk, contrary to the objectives of the Local Environmental Plan (LEP) and Development Control Plan (DCP), which aim to ensure development is contextually appropriate and protects neighbouring amenity.

3. Loss of Views for Residents and the Public

The development will result in considerable view loss for neighbouring properties and the broader public. Specifically:

- The building's height and bulk will obstruct existing private views to significant landscapes and vistas.
- Public view corridors from nearby streets and open spaces will be compromised.
- The applicant's photomontages misrepresent the scale of the proposal, inaccurately suggesting that a 21-metre structure is comparable to a 6-metre two-storey dwelling.

This misrepresentation downplays the true extent of visual impact and view loss, and in my view highlights the contempt with which Moran are treating the local community and state planning.

4. Insufficient Setbacks and Lack of Height Transition

The proposal fails to provide adequate side and rear setbacks, which:

- Amplify the perception of bulk and scale,
- Do not facilitate a respectful transition to adjacent lower-density dwellings, and
- Result in adverse amenity impacts including visual dominance, overshadowing, and privacy loss.

There is no meaningful attempt to modulate the building's form or articulate façades to reduce its visual impact. The result is a monolithic structure that overwhelms rather than integrates with its surroundings.

As someone who has recently been through the DA process at a local council level and was forced to push back a low-density two story residential building from the boundary due to its 'imposing nature' the potential double standards on display here are tough to accept.

5. Removal of Significant Vegetation

The development involves the removal of numerous mature and potentially significant trees, some of which possess heritage or ecological value. This loss:

- Diminishes the natural landscape character of the area,
- Removes important habitat and urban canopy, and
- Eliminates screening vegetation that currently mitigates the visual impact of built form.

The extent of tree removal reflects poor site planning and a disregard for the environmental and aesthetic value of existing vegetation.

6. Negative Microclimatic Effects

The bulk and placement of the proposed building will alter local airflow patterns, leading to:

- Reduced natural ventilation for neighbouring properties,
- Loss of prevailing breezes that help moderate summer temperatures, and
- A stagnant microclimate that may intensify urban heat island effects.

These impacts will degrade residential amenity and reduce environmental sustainability in the area.

7. Inadequate Parking and Traffic Implications

The proposal provides insufficient parking for residents and staff, failing to meet the requirements of both the SEPP and Council's DCP. This deficiency will:

- Lead to overflow parking in surrounding residential streets,
- Worsen existing parking shortages, and
- Increase traffic congestion and safety risks on roads not designed for higher volumes.

Additionally, the construction of three basement levels is likely to cause prolonged disruption, noise, and traffic management challenges.

8. Overdevelopment of the Site

The proposal clearly constitutes overdevelopment, with a scale and intensity far exceeding what is appropriate for the site and locality. It fails to respond to site constraints, over-intensifies land use under the guise of "Over 55s housing," and does not offer genuine public benefit or design excellence to justify such a significant variation.

Rather than contributing to housing diversity, the proposal compromises residential amenity, environmental quality, and neighbourhood character.

9. Precedent and Cumulative Impact

Approval of this development would set a concerning precedent, encouraging similar proposals that disregard planning controls related to height, bulk, and scale.

Over time, this would erode the low-density character of the area and diminish its visual and environmental quality.

10. Inconsistency with LMR Stage 2 Reforms

Under the State Government's LMR Stage 2 reforms, increased building heights apply only to specific town centres within 800 metres of designated hubs. Notably, Narrabeen was excluded from these reforms following community consultation and Council submissions.

Despite this, the applicant seeks to apply development standards intended for areas included in the reforms. This is inappropriate and unfair, as it attempts to circumvent planning outcomes that were shaped by extensive public engagement and accepted by the State.

Permitting a five-storey development in Narrabeen would contradict the intent of the reforms and grant an unjustified advantage to the applicant.

11. Lack of Community Consultation

As a nearby resident, I did not receive any formal notification of the proposed development via correspondence or letter drop. This raises serious concerns about the adequacy of the public consultation process.

The Development Application should not proceed until the State is satisfied that:

- Proper and inclusive consultation has occurred,
- All affected residents have been informed of the proposal, and
- The community has had a fair opportunity to understand and respond to the development.

12. Conclusion

In light of the above concerns—ranging from non-compliance with planning controls to adverse environmental, visual, and amenity impacts—I strongly oppose the proposed development. It is inconsistent with the character of the area, breaches established planning frameworks, and fails to deliver outcomes that justify its scale and intensity.

I trust this submission will be given the serious consideration it deserves and respectfully urge the NSW State Planning Authority to reject the Moran application.