

Submission Objecting to SSD-76220734 – Indigo By Moran, 156 Ocean Street, Narrabeen

Application Number: SSD-76220734

Status: Exhibition

I Object to the Proposed Development for the following reasons:

1. Inappropriate Scale and Bulk

The proposed five-storey height is inconsistent with the Northern Beaches Local Environmental Plan (LEP) and Development Control Plans (DCP), which aim to preserve the low-rise coastal character of Narrabeen.

- Current controls for R2 Low Density Residential zones typically limit building height to 8.5–9.5m (approx. 2–3 storeys), and R3 Medium Density zones allow up to 3 storeys in most cases.
- The proposal significantly exceeds these limits, creating a dominant built form that is incompatible with the established character, contrary to the NSW Planning Circular PS 21-026, which requires development to respect and enhance local character.

2. Visual Impact Assessment Deficiencies

The Visual Impact Assessment (VIA) fails to meet NSW guidelines for transparency and accuracy:

- Photo montages do not correctly represent the true bulk and height from key public viewpoints.
- The assessment does not adequately consider sensitivity of coastal landscape character zones or cumulative impacts, as required under NSW visual impact guidelines.
This misrepresentation undermines informed community participation and breaches principles of Better Placed Design Policy, which prioritizes contextual and high-quality design.

3. Traffic and Road Safety Concerns

The development will introduce significant traffic volumes on Ocean Street and surrounding roads, which are already constrained.

- No robust mitigation measures have been provided to address congestion, parking demand, and pedestrian safety.
- This conflicts with Northern Beaches DCP objectives for maintaining safe and efficient local road networks.

4. Noise and Amenity Impacts

Both construction and operational phases will cause:

- Prolonged noise disturbance in a quiet residential area.
- Reduced amenity for existing residents, contrary to Housing SEPP Seniors Housing Design Principles, which require developments to minimize impacts on neighbouring amenity and streetscape.

5. Environmental and Coastal Character

Narrabeen is a sensitive coastal environment with high scenic value. The proposed scale:

- Risks overshadowing public spaces and reducing natural light.
- May impact coastal views from public vantage points, diminishing visual amenity for residents and visitors.

This contravenes Northern Beaches Council's DCP amendments aimed at protecting local character and environment.

6. Precedent and Strategic Planning

Approval would undermine Northern Beaches Council's strategic planning framework, which emphasizes context-sensitive design and community engagement under the Environmental Planning and Assessment Act 1979 and the draft Northern Beaches LEP.

Conclusion: Community Impact

This proposal represents overdevelopment that disregards local planning controls, community expectations, and NSW planning principles for character, amenity, and environmental sustainability.

- It will erode the coastal village identity of Narrabeen, increase traffic and noise, and set a dangerous precedent for future high-rise developments in low-rise zones.
- The community's quality of life, visual amenity, and environmental values will be significantly compromised.

Requested Action:

I urge the Department to refuse the application or require substantial amendments to:

- Limit building height to three storeys maximum in line with local character.
- Provide an accurate Visual Impact Assessment.
- Address traffic, noise, and environmental concerns through comprehensive studies and mitigation strategies.