

2nd November, 2025.

Secretary,
DPHI

Dear Sir/Madam,

Objection to Indigo by Moran Seniors Living (SSD-76220734)

I am the owner of 6/150-152 Ocean Street, Narrabeen and have been for the past 4 years. As a 64 year old widower, this was a sea change for me downsizing from my large family home. The appeal for me to purchase this unit was the proximity to the beach and the lovely feel that Narrabeen offers. The other appeal was that the area does not allow high rise buildings.

Please see below my strong objections to the above development.

1. Notification of Impending Development

As an adjoining resident, I have received no notice of the development by correspondence or letter drop which brings into question the effectiveness of the public consultation. The first and only correspondence I have received, was a letter from the Department of Planning, Housing and Infrastructure dated 20th October 2025. I did not receive this letter until 27th October (postmark on the letter is 22nd October). For a development of such magnitude that will affect my property significantly, I find this to be very unprofessional and underhanded.

2. Inconsistent with Surrounding Character and Built Form

The proposed development is grossly inconsistent with the prevailing character of the surrounding area, which consist mainly of:

- . Single and two-storey residential dwellings and
- . Low-rise residential unit blocks comprising of two and three storeys

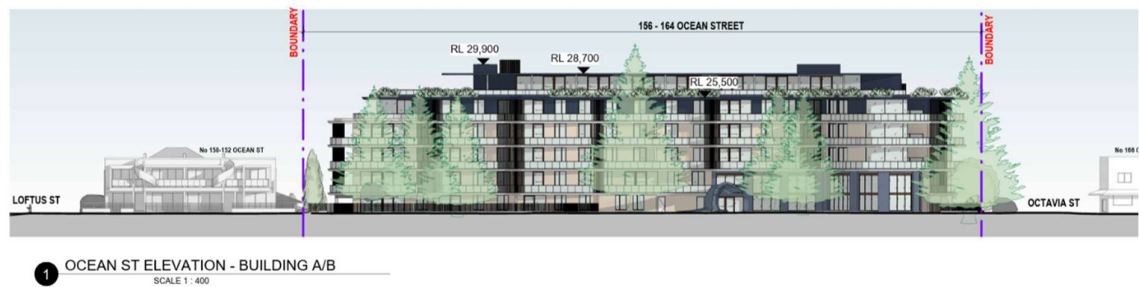
How the developer can say that ***“The siting of the building respects the neighbourhood’s residential character, minimising adverse impacts on the streetscape or adjacent properties”*** is totally misleading. How can a 6 storey building not impact the streetscape or adjoining properties!

3. Height

The height of the building is not in keeping with the neighbouring structures. The LEP permitted height is 8.5m. With the amended Clause 78 bonus height of 3.8m, this gives a combined height of 12.3m for the site. As shown in the below East Elevation diagram, the height measurement to the top of the roof is 28.700 which equates to 73% over the LEP permitted height.

The developer states that ***“At the street frontage, the building height is compatible with adjacent structures, maintaining a cohesive visual rhythm along the streetscape”***. The adjacent structure I believe is they refer to is 157 Ocean Street. They state that this building has a height of 21.946m to the top of the roof. I do not believe that to be the case and would ask that this be clarified.

How can there be “*a cohesive visual rhythm along the streetscape*” when the image below clearly shows that the proposed development overshadows all existing structures.



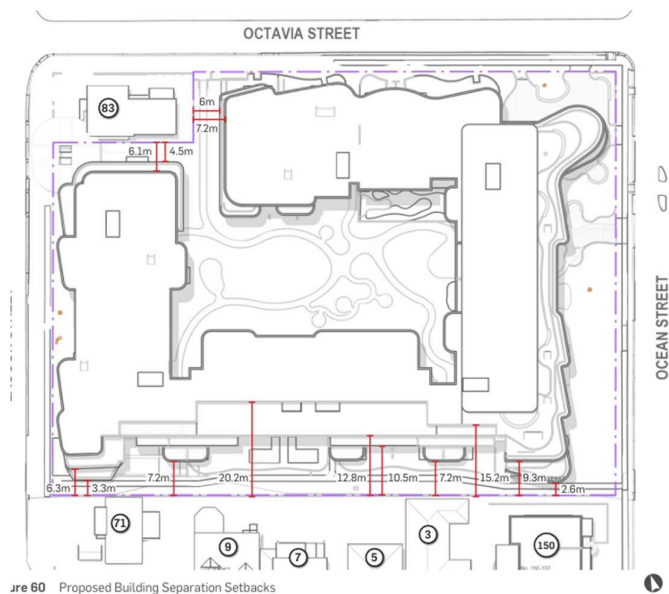
In light of the above, I request that the height be extensively scaled back to a level that is compatible with adjacent structures and in keeping with the neighbourhood.

4. Set back

I refer to the below statement on pages 15 of the EIS Report

• ***The buildings have been scaled back with significant building setbacks and staggered articulated forms along the boundaries shared with the adjoining properties to minimise bulk and scale and impacts on environmental amenity.***
The proposed development has been designed with a strong emphasis on ensuring both visual and acoustic privacy for its residents, as well as for the neighbouring properties.
The development's site planning considers the location of windows and balconies, ensuring that they are positioned in a way that minimizes direct line-of-sight into adjacent homes.

As shown below, the setback to 150 Ocean Street is 2.6m from the end of the balcony. How can this give our property any privacy, particularly to the owners of Units 4 and 8.



South Interface with 150 Ocean Street:– North facing windows are visible on the neighbouring facade, where a minimum of 2.6m setback is proposed for the south-eastern balconies from Ground Level to Level 3.

Propose that the balconies on the souther side be deleted so that the setback would be 9.3m.

There has also been no attempt to step the building or articulate facades to reduce perceived bulk and scale as per LEP regulations. As mentioned in Item 11 below, the DA lodged for Units 5, 6 and 8 of 150 Ocean Street for 3 vergolas was granted as long as Units 5 & 8 had a 1m set back from the side of the building to avoid a boxy look. The developer has not allowed for this in the current form.

5. Norfolk Pines

The Gadigal Aboriginals have stipulated that the Norfolk pines fronting Ocean Street and Octavia Street must be preserved. I believe that in light of the fact that the developers will be excavating to accommodate 3 basement level carparks, that the 12.8m frontage from Ocean Street is not sufficient to preserve these trees. I also believe that the removal of a large number of established and significant trees demonstrates poor site planning and a disregard for the environmental and aesthetic value of existing vegetation.

The arbourist has stated in his report that there is a moderate to high chance that these pines will not survive due to the 3 level basement excavation and the closeness of the pines to the construction.

6. Shadowing

Building setbacks along the south boundary, ranging from 10.4m to 12.7m from the southern boundary, ensures the current access to sun in mid-winter for the southern neighbouring sites been maintained.

The above statement is incorrect. The setback along the south boundary range from 2.3m to 12.8m as shown in the above diagram in item 4. As such, I believe that the shadow diagrams that accompany the proposal are inaccurate. The scale of the development will I believe shade my rooftop terrace substantially in the winter months when the sun is lower in the sky. I would ask that an independent shadow diagram report be obtained to substantiate this.

7. Aged Care Housing

The proposed development represents a significant contribution to the supply of aged care housing in the LGA. The proposal is a positive housing and social outcome for the community as it allows older people to age in place.

This development will deliver 149 Independent Living Units (ILU) and a 10-room aged care facility for seniors in a location that is in high demand and poorly supplied. The design quality and communal facilities offered as part of the development are intended to assist the Government in its design excellence and housing for seniors' priorities at a state and national level.

This approach is also reflected in Council's own strategic planning policies (including their Local Housing Strategy), which recognises that there is an identified demand for an additional 1,716 self-contained retirement village units ('standard' housing generally targeted to over 55s), 502 assisted living units (with some support facilities) and 765 nursing home beds (offering end of life care) by 2036.

The above statements contained in the proposal do not address the current and future needs of our aging community. When the current site was owned by the Wesley Mission, it provided affordable housing and care to our ageing population. This proposal is offering expensive housing for the over 60's and does not address the need for standard housing or nursing home beds as outlined above in the Council's planning policy. Do they think that by adding 10 beds to the development that this then classes the site as an aged care facility? I believe that they are using the 10 beds to get the project approved though the SEPP?

8. Visitor Car parking

With only 7 visitor car spaces (4 of which are disable spaces) for 149 units (not including the 10 beds) the adjoining streets are going to be impacted significantly. The adjoining streets are already overloaded and the addition of the number of occupants in this development will increase not only local traffic but street parking.

9. Bus Stop

Relocation of the bus stop from the corner of Ocean Street and Octavia Street further south and re-sign the current Bus Zone as a 'No Stopping' area. This adjustment aims to improve traffic movement and enhance overall safety along this section of Ocean Street. As part of the proposal, approximately four on-street parking spaces along the affected frontage will be reinstated. Additionally, a new 12.5-metre-long resident drop-off zone is proposed to support short-term stopping needs.

Once again, the above statement is inaccurate. If you move the bus stop further south then the four additional on-street parking spaces will be taken up for the new bus stop. Also, does the new 12.5metre-long resident drop-off zone then take up the space where the bus stop was? In light of the fact that you cannot park or stop within 10m of a round-about, the relocation of the bus stop would in fact reduce the number of car parking spaces along that strip. There is also a Post Box in this strip which reduces the parking. The whole moving of the bus stop makes no sense whatsoever and does not add any further parking but in fact reduces the number.

10. Construction Worker Parking

"Construction Worker Parking There will be no on-site car parking available for workers during the earlier construction stage. Once the internal driveway and basement car park are built (and when construction activity is most intensive), workers can park in the basement. Given the proximity of the site to high-frequency public transport services, all workers will be encouraged at all times to utilise the highly accessible public transport system which exists in the vicinity of the site or to carpool wherever possible. A tool drop-off and storage facility will be provided within the site. This would allow tradespeople to dropoff and store their tools and machinery, allowing them to use public transport to travel to/ from the site daily. Workers will also be informed of appropriate tool/equipment drop-off and storage arrangements made within site sheds and amenities provided on-site.

Bus and train schedules will be provided to all workers during site induction to demonstrate alternative modes of transport available."

I believe that the above is not practical which means that there will be significant strain on street parking around the site. It will also increase traffic. The completion of the basement car park will not be completed for over 12 months from the time of commencement and therefore traffic and parking will affect the area substantially.

11. 150 Ocean Street Roof Terraces

The below statement from the Architectural Design Report is incorrect. None of the 4 rooftop terraces at 150 Ocean Street have rooftop pergolas. In fact, Units 5, 6 and 8 have been attempting to have vergola systems put on half of their terraces for the past 2 1/2 years which is how long it has taken to get the DA approved due to height regulations and set back rules. Now we will have look into amending the DA to increase the vergolas so that we can have some privacy from the proposed development which will be looking directly at us. Who knows how long that will take to approve! Also note that the proposed vergolas do not reduce visibility from anyone except the development at 156-164 Ocean Street.

The roof terraces of the RFB are screened by existing pergola structures, which provide a semipermeable visual barrier. This treatment reduces visibility from the proposed development and the public domain such as the existing apartments building across the road while maintaining access to sunlight and coastal breezes.

12. Adverse Microclimate Impacts (Wind and Heat)

The development's excessive bulk and placement will alter airflow to 150 Ocean Street resulting in reduced natural ventilation and eliminate prevailing breezes that currently cool the building in the summer months.

13. LMR Stage 2-2025

On the Northern Beaches, the new State Government LMR controls apply to all residential zoned land within 800 metres walking distance of:

- Balgowlah Stockland Shopping Centre
- Dee Why Town Centre
- Forestville Town Centre
- Forestway Shopping Centre
- Frenchs Forest Precinct (Warringah Road)
- Manly Town Centre
- Manly Vale Town Centre
- Mona Vale Town Centre
- Warringah Mall Shopping Centre

Following Northern Beaches Council submissions, four town centres that had originally been proposed to be included in the Stage 2 Reforms, have been **excluded**: Warriewood, Narrabeen, Newport and Belrose.

The zones were excluded after significant community consultation and objections over the density and height changes in these four areas, which was ultimately accepted by the State

demonstrating acceptance of the submissions including that Narrabeen should not be part of the Stage 2 Reforms. The reforms introduced increased heights for developments up to 21 metres.

The application by Moran seeks to impose on Narrabeen a development at heights that are available under the Stage 2 Reforms where this area has been excluded from the Stage 2 Reforms. It is not appropriate to permit a 6 level development that will be more than 73% higher than the LEP permissible height for buildings in the area. It seeks an unfair advantage and a use that is significantly beyond that available to others in the community.

I request that the you take into account everything that I have addressed above and that you seriously consider rejecting this proposal in its current form.

I look forward to your favourable response.

Yours sincerely,

Donna Hall