

To: Director of Social and Diverse Housing Developments

Re: Submission for Indigo by Moran Seniors Living Development SSD-76220734

I am the owner of Unit 4 150 Ocean Street, Narrabeen (Seascape) and live next door to the Indigo by Moran site in one of the adjoining properties most affected by the proposed development.

I do support redevelopment of housing for seniors at this location as it was previously used for a similar purpose and Sydney does need developments that will allow older people to downsize from the family home.

However, I object to aspects of the Indigo by Moran Seniors Living Development SSD-76220734 application that do not comply with the SEPP regulations for this type of development. This non-compliance will directly affect me and my family's future quality of life. All other nearby residents will be affected by the scale of the building as it does not fit the character of the area and the current streetscape. The height and domination of the skyline by the development will effectively cut Narrabeen Peninsula in half, south from Indigo and north from Indigo.

Most issues can be addressed by a more balanced development approach and close compliance with regulations governing height and setbacks for this type of development. The proposed building is 71.5% over the SEPP (as per the EIS) conditions relating to height and does not comply with either the SEPP or the NSW Government Seniors Housing Design Guide 2023 specifying adequate setbacks to allow site enjoyment by seniors and protect the privacy of neighbours.

The applicant did not contact me or provide basic details during their design and consultation period and appears to have completely ignored the following issues affecting us and other adjoining properties:

1. Privacy
2. Overshadowing.
3. Bulk and Scale of the Development.
4. Parking and Traffic Issues.
5. Landscaping and the Iconic Norfolk Pines.
6. Requested Outcomes
7. Conclusion

In one sentence my major objection to the proposed development is that it is too high, too big and too close to adjoining properties. Compliance with all SEPP regulations will lead to a better design to enhance the neighbourhood.

It is extremely disappointing that facts presented in the supporting documents have been modified in the EIS to enhance the notion that the major height variation request does not impact any the adjoining properties. The clearest example for our property was the assertion in the EIS concerning shadowing on the June 21 Winter Solstice that the *proposed development will not impact the private open space for No. 67 Lagoon Street and No. 150-152 Ocean Street*. The shadow diagrams in the Architectural Drawing support the exact opposite conclusion for Unit 4 150 Ocean Street.

Please find following further details on each of the above issues including suggested solutions. Should you require any further clarification of my submission please contact me.

1. Privacy

Window and Courtyard Privacy: Our privacy will be compromised for all windows and our private courtyard on the northern side of the unit. (Diagram 1 & 2) The proposed building has 3 large south facing balconies 2.605m from the boundary that look directly into our lounge, kitchen, bathroom, and main bedroom windows.

Intrusive South Facing Balconies: These balconies are at heights of 3.2m, 6.4m and 9.6m with a roof overhang 12.8m high. Plans show privacy screens but these appear to be for the westerly sun and do not provide privacy cover for the 3m curved area closest to the boundary. Anyone standing on these balconies would be approximately 7.3m with a direct line of site into our windows.

Diagram 1 - East Elevation Ocean Street

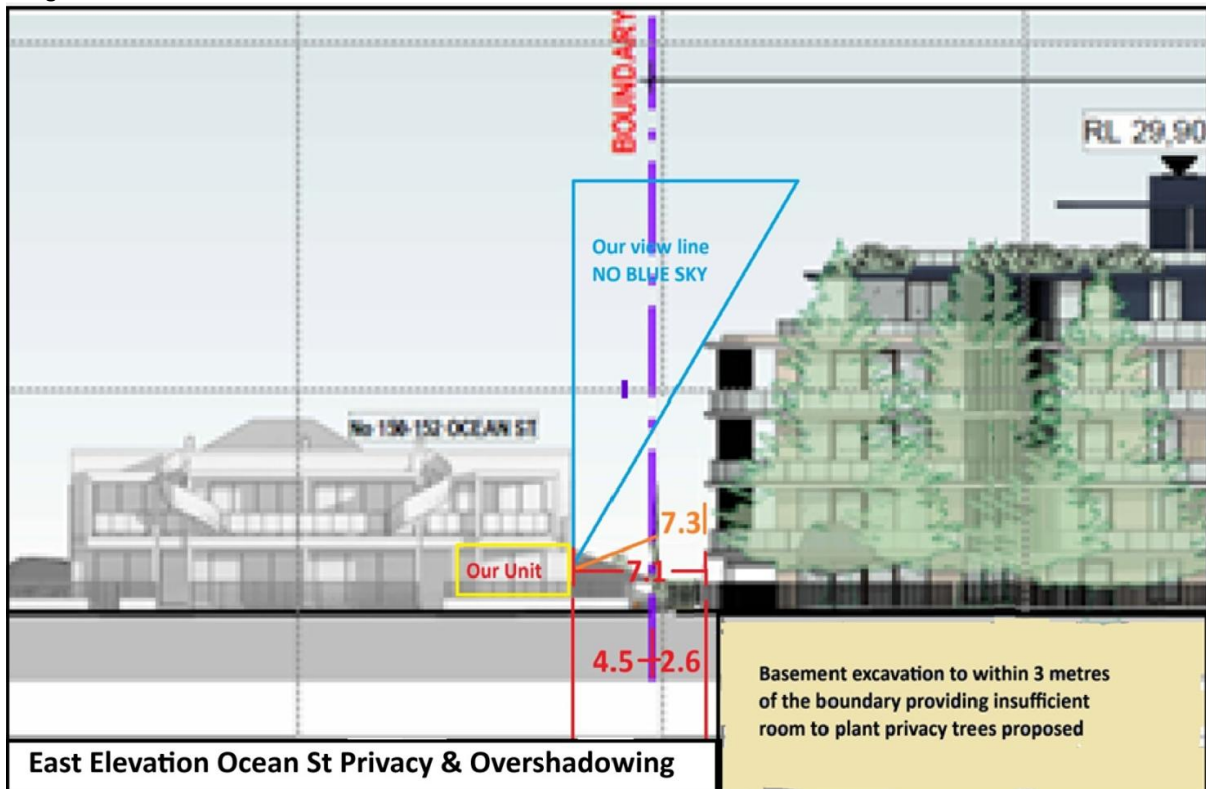
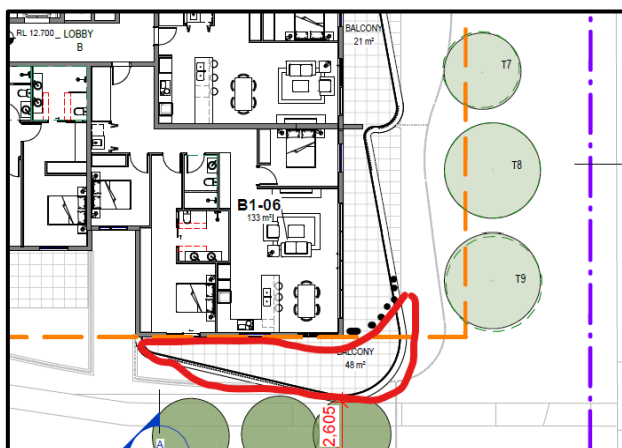


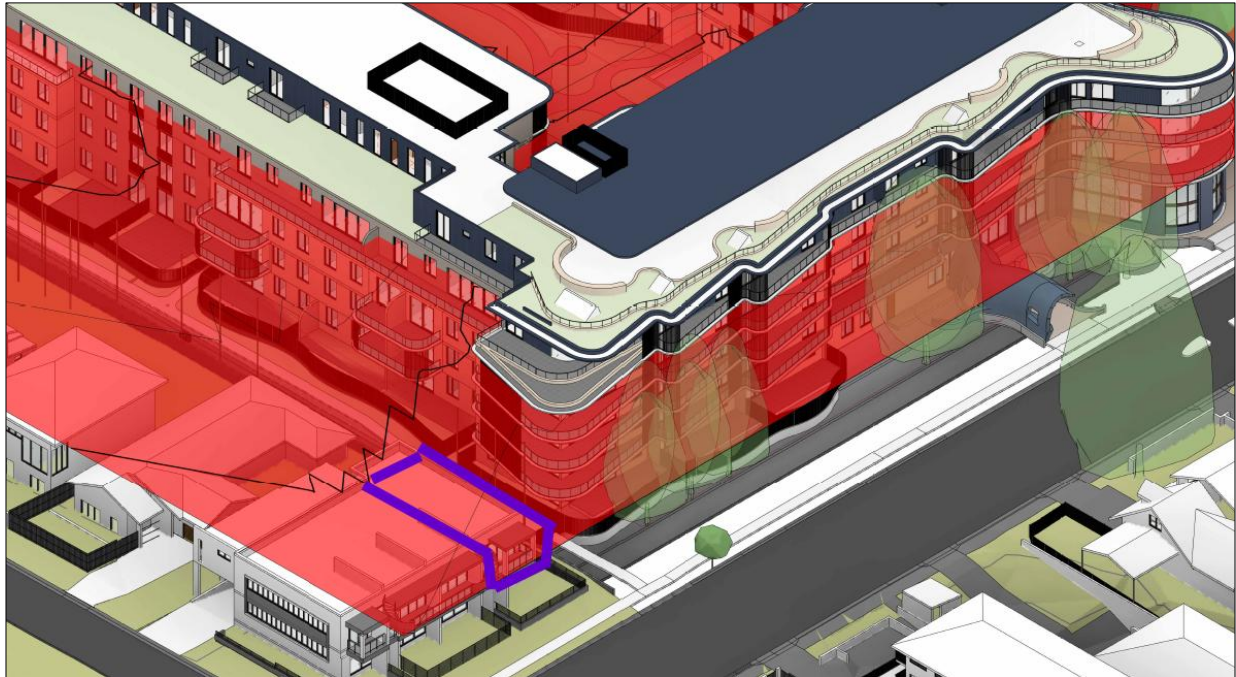
Diagram 2 South Facing Balconies



2. Overshadowing

Design Principles Ignored: Our ground floor unit in 150 Ocean Street is identified by the purple outline on the 3D Diagram (see Diagram 3). The proposed building ignores the principles of the NSW Government Seniors Housing Design Guide for shadowing affecting adjoining property. The scale of the proposed development comes at the expense of sunlight for adjoining properties.

Diagram 3 - Position of Unit 4 150 Ocean Street



Shadow Diagrams: The shadow diagrams in A1_Architectural_Drawings show complete shading on our northern wall, our courtyard and the clothesline on the 21 June for period from 9am to 3pm.

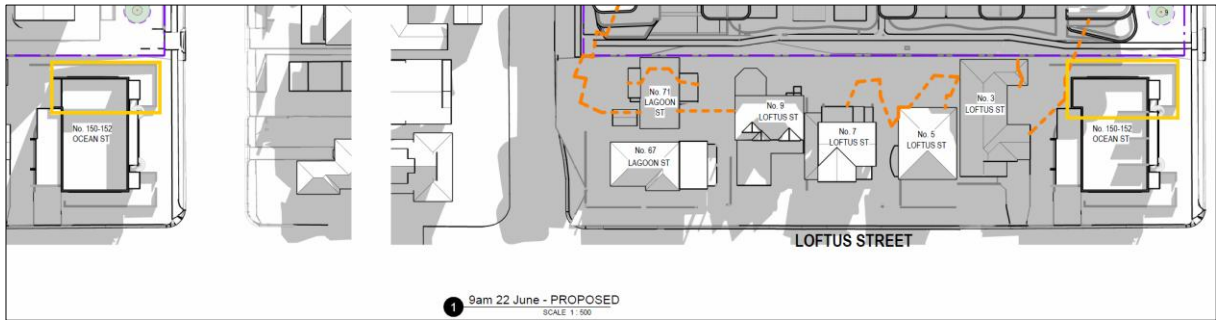
The seven shade diagrams (Diagram 4) do not support the assertion in the EIS that on the June 21 Winter Solstice the *proposed development will not impact the private open space for No. 150-152 Ocean Street*. The diagrams for every hour show a negative impact of the proposed building when compared to the existing situation.

The shade diagrams for 21 March show substantial shadowing and even the diagrams for December 21 show shadowing so it is impossible with the diagrams provided to get an understanding of the total shadowing effect on our property. Our property is clearly impacted by shadowing for substantial periods year-round by the proposed building. This has not been acknowledged in the EIS together with statements totally denying or understating any negative outcomes of shadowing on adjoining properties.

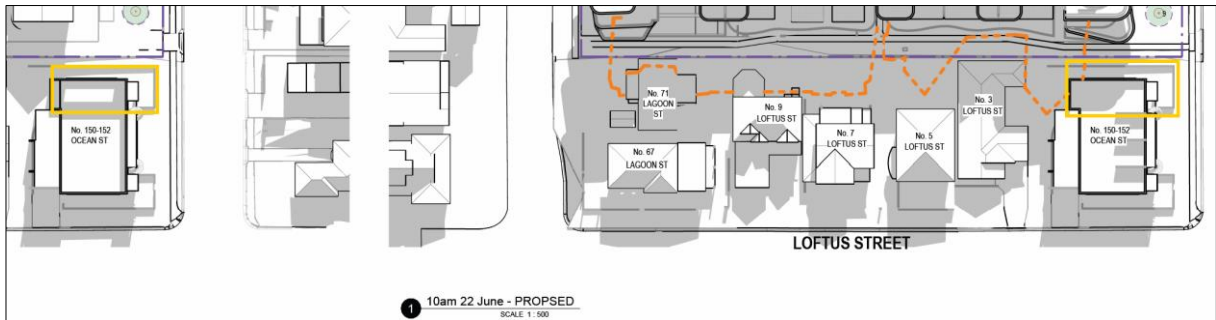
The direct year-round sunlight we currently get into our northern windows and our private courtyard will be non-existent for parts of the year should the current proposal be approved.

Diagram 4 Shadow Diagrams 21 June Left: Current and Right: Proposed

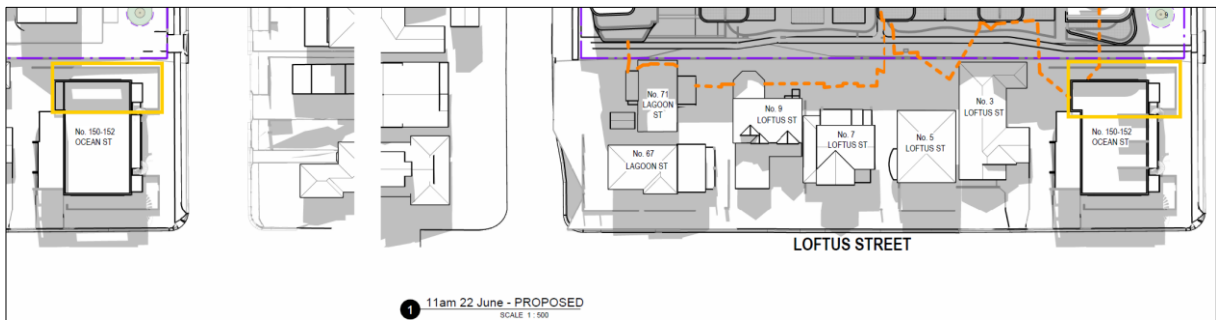
9am - Yellow Squares outline our unit and courtyard



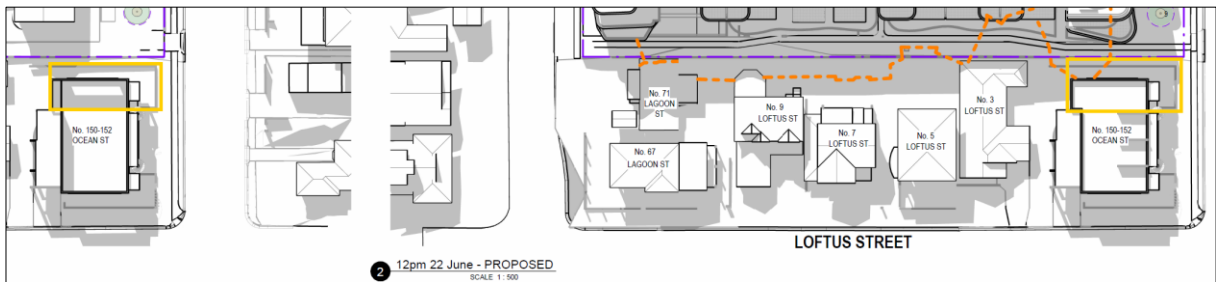
10am



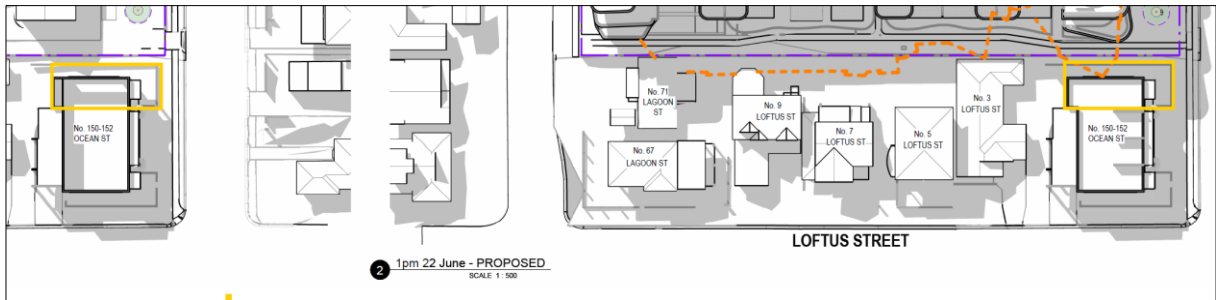
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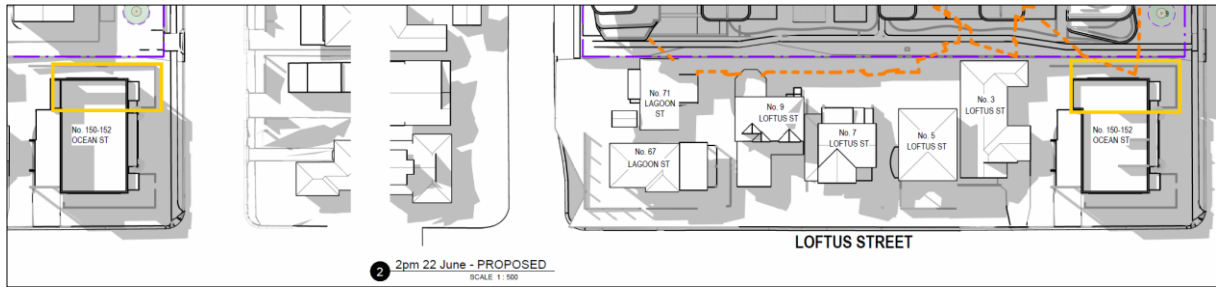
12pm



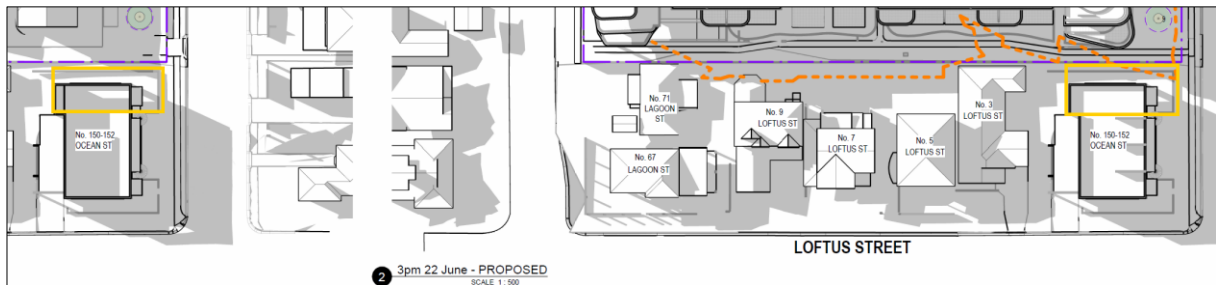
1pm



2pm



3pm



Loss of Sunlight: The loss of sunlight will affect the future mental and physical health of anyone living in our unit. Access to sunlight to promote good health is an objective of NSW Government Seniors Housing Design Guide.

Other obvious issues from the loss of sunlight throughout the year include limited use of the clothesline forcing use of a clothes dryer, higher use of electricity for lighting and heating, our garden may need plants that do not require sunlight and there will be no such thing as sunbaking in the courtyard.

Loss of Blue Sky: Currently we can see blue sky from all our north facing windows (Diagram 5). Our proposed new view will be balconies, walls, and neighbours' windows with no blue sky possible.

Diagram 5 - Our Current Window View will be Replaced by Shade and a Large Building



3. Bulk and Scale of the Development

The Dominator: The bulk and scale of the development will visually cut Ocean Street and the Narrabeen Peninsula in half. There are no other existing buildings with the same street frontage and height on Ocean Street and no other buildings approaching the size and scale proposed for Indigo on the Narrabeen Peninsula. Our property and the surrounding area will be dominated by the sheer mass of this development.

Main Entrance on Ocean Street: The plans provide for a non-compliant boundary setback of 2.8m for the 4 storey Indigo pedestrian entrance on Ocean Street further impacting the streetscape.

Diagram 6 – Elevations looking from Ocean Street and Loftus Street



Increased Floor Space Ratio: We agree with higher population densities to achieve the NSW Governments target for increased housing but not at the expense of the surrounding properties and varying existing SEPP regulations.

6 Storey Development: There was extensive community and council consultation on Stage 2 of the LMR controls. Narrabeen was excluded from areas allowing exemptions under the new code for height limits, setbacks and density. This development application is a 'back door' method to negate this decision and create a height precedent for a 6 storey (9 level) development against community and council wishes.

Building Noise and Traffic Disruptions: The development requires demolition of the existing site, an 80,000 cu mt excavation and then construction of 9 levels for the proposed development. The total estimated construction period of 525 days involving at least 60 hours of noise, dust and many additional heavy traffic movements per week. The initial 26 weeks of demolition and excavation works specified in the traffic report will make our unit unliveable during this period. The current building scale with minimal boundary setbacks will mean maximum disruption and building noise for adjoining properties.

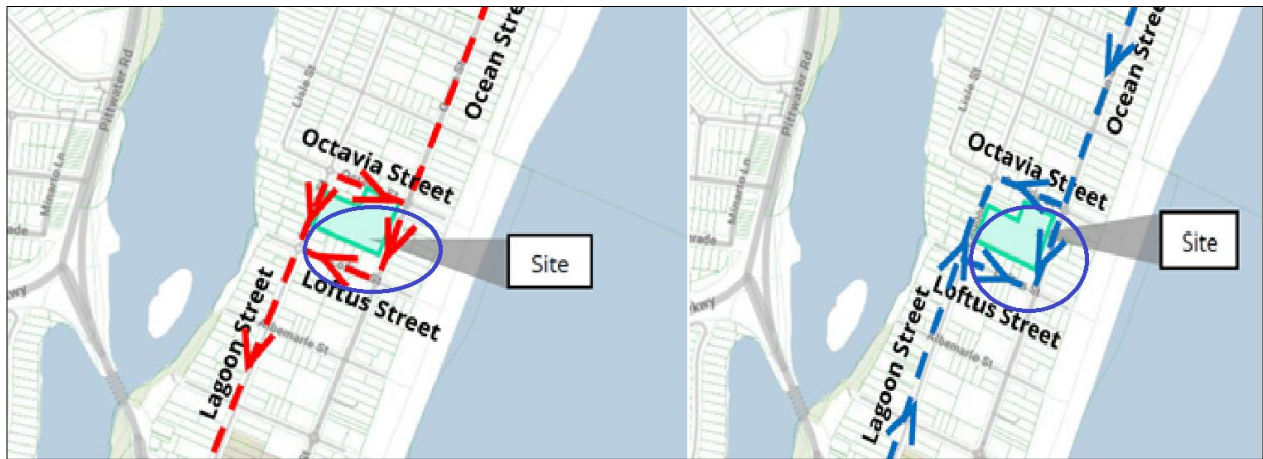
4. Parking and Traffic Issues

The EIS includes details of 192 car spaces provided in the 3 basement levels. This number of car spaces is the absolute minimum required under SEPP 2021 as per the Car Parking Assessment. If approved this would lead to parking chaos in an area that currently suffers from a lack of street parking with the proximity to the beach and historic under provision of off-street parking.

Workers Carparking: The EIS states that there will be no onsite parking for workers until the basement is complete. The Works Program indicates this period could be up to 12 months with up to 60 workers onsite. There is an assertion that workers onsite will use public transport and carpooling during this period but even if this was true the current shortage of street parking will lead to parking chaos during the construction period.

Construction Traffic Routes: The Traffic Impact Statement has diagrams suggesting that Loftus Streets could be used in the Truck Access Routes. Loftus Street should be excluded as the street is too narrow to support demolition, excavation, or development traffic. There is no roundabout at Loftus Street and trucks turning right into Loftus Street would block southbound traffic (Diagram 7).

Diagram 7 – Traffic Flow Diagrams Including Ocean Street and Loftus Street



Residents Carparking: The EIS states there will be 171 residential car spaces provided for the site. Given that these are luxury apartments it is reasonable to expect that residents will have 2 vehicles.

Visitor Carparking: The EIS states there will be 7 visitor spaces but 3 of these are accessible spaces meaning only 4 able body visitor spaces for 149 apartments. Indigo includes extensive facilities for visitors with a disproportionate amount of visitor parking.

Bus Stop: The EIS requests a change in the bus stop location to an area closer to 150 Ocean Street. This suggested mid-block location is a NIMBY request that shifts the bus shelter and noise of the bus stop away from exclusive apartments above the Indigo entrance pavilion.

5. Landscaping and the Iconic Norfolk Pines

Norfolk Pines: The application acknowledges the importance of landmark Norfolk Pine Trees on the site. However, only 7 iconic Norfolk Pines on the Ocean Street frontage are retained and the largest healthy Norfolk Pine Tree (T6) is being removed without justification. Also concerning is the statement by the arborist that the chances of loss of the retained Norfolk Pine trees as being moderate to high.

Screening Trees: The proposed new 10m high screening trees shown on the landscape plan are positioned close to the boundary with the root system and canopy encroaching our property at 150 Ocean Street. These trees will further affect the light and solar amenity of our property.

6. Requested Outcomes

I request that the current proposal for Indigo by Moran Seniors Living Development SSD-76220734 be rejected with the option for the developer to revise the proposal in compliance with existing SEPP conditions and the NSW Government Seniors Housing Design Guide 2023 objective to *positively enhance the streetscape and uplift the quality of built form in the neighbourhood, and provide a landscape buffer to soften the development.*

Issues to be addresses by the developer.

- revised plans to ensure privacy for our northern windows and private courtyard.
- revised plans including a solar study to ensure our property retains the current level of solar access.
- revised development concept with separate lower height buildings.
- revised parking plans for temporary off-street parking for construction workers for the period until the basement is complete.
- revised truck routes to exclude Loftus Street for all construction works.
- revised basement plans to provide adequate residential car spaces for each apartment and a higher ratio of visitor spaces to suit the scale of the development.
- retain the current location of the bus stop.
- revised arboricultural plan to retain all 8 Norfolk Pines on Ocean Street with further measures to ensure they will not be lost during construction.
- revised plans to reduce the basement footprint to provide larger areas of deep soil volume to support screening trees further from our northern boundary.

7. Conclusion

I welcome the re-development of the 156 Ocean Street site for seniors living. However, I cannot support the current proposed development application for the reasons given in this submission.

Thank you for your consideration of this submission.

Richard Inkster