

Submission of Objection – SSD-76220734 (Indigo by Moran, 156 Ocean Street Narrabeen)

To: The Secretary, NSW Department of Planning, Housing and Infrastructure (DPHI)

From: Darren Geros – Resident & Property Owner, 1 Loftus Street and 143 Ocean Street, Narrabeen NSW 2101

Date: 2 October 2025

Project: State Significant Development – Indigo by Moran (Seniors Living)

Site: 156–164 Ocean St / 81–81A Lagoon St / 8 Octavia St, Narrabeen

1. Personal Context and Community Concern

My family have lived in Narrabeen for multiple generations and I own two nearby properties—my family home at 1 Loftus Street and another residence at 143 Ocean Street—both within direct proximity to the proposed Indigo by Moran site. As a long-standing local resident, I am deeply concerned by the excessive scale, lack of transparency, and minimal consultation associated with this application. This proposal represents an overdevelopment that would permanently alter the character, livability, and environmental integrity of our peninsula community.

2. Statutory Framework and Assessment Responsibilities

The development is declared State Significant Development (SSD) under section 4.36 of the Environmental Planning and Assessment Act 1979 (NSW). Despite its SSD status, the Department must still apply the section 4.15 evaluation criteria, which require consideration of:

- consistency with environmental planning instruments;
- likely environmental, social, and economic impacts;
- the site's suitability for the proposed use; and
- the broader public interest.

In its current form, the application demonstrably fails to satisfy these obligations.

3. Non-Compliance with Applicable Planning Instruments

a) State Environmental Planning Policy (Housing) 2021 – The proposal fails to meet the design and amenity principles outlined for seniors housing, particularly those relating to contextual integration and resident comfort. The excessive bulk and height do not align with the surrounding low-density residential fabric.

b) State Environmental Planning Policy (Coastal Management) 2018 – The site sits within both the Coastal Environment and Coastal Vulnerability Areas. The 11.5-metre-deep excavation penetrates the water table, breaching Clauses 11 and 12 which mandate a precautionary approach to managing coastal hazards.

c) Northern Beaches Local Environmental Plan 2011 – The proposed 21.5m height conflicts with Clause 4.3 (Height of Buildings) and the objectives of the R2 Low Density zone, which aim to preserve the low-scale coastal character.

d) Northern Beaches Development Control Plan 2019 – The development breaches provisions concerning solar access, visual privacy, and landscape character. Loss of mature canopy vegetation contradicts Council's Urban Tree Canopy Strategy and the environmental objectives of Part D6 of the DCP.

4. Deficiencies in the Environmental Impact Statement (EIS)

A. Incomplete and Misleading Information – The EIS omits or misrepresents key data relating to traffic generation, overshadowing, and flooding. Several reports rely on broad assumptions that understate the true extent of the project's impacts on neighbouring properties and the environment.

B. Minimal BASIX Compliance – Sustainability documentation shows that BASIX targets are only marginally achieved. There is no evidence of passive solar design, natural ventilation strategies, or meaningful water reuse measures, contrary to Clause 3.6 of the Housing SEPP and DCP Section B5.

C. Traffic and Safety – The local road network is already constrained. The submitted Traffic Impact Assessment does not accurately model the cumulative effects of resident, staff, and service-vehicle trips during peak times.

D. Groundwater and Flooding – Deep excavation within a flood-prone coastal site is inconsistent with the Coastal SEPP's requirement for a precautionary approach to development in hazard-prone areas.

5. Procedural and Governance Concerns

A. Lack of Community Consultation – There has been no meaningful consultation with the local community. Residents were not informed or engaged prior to lodgement, undermining public confidence in the planning process.

B. Inadequate Public Exhibition Period – The public submission window was unreasonably short given the scale and complexity of the project. A two-week period is insufficient for residents to review more than 40 EIS attachments and technical studies.

C. Absence of an Independent Design Review Panel – The lack of an independent design review process is concerning. An IDRP should have been convened for a development of this magnitude to ensure objective design scrutiny and accountability.

D. Precedent and Cumulative Impact – Approving a structure of this scale would set a

dangerous precedent for future developments along Ocean Street and the Narrabeen Lagoon corridor, threatening the established character of the Northern Beaches.

6. Public Interest and Planning Principles

Under section 4.15(1)(e) of the EP&A Act 1979, planning authorities must act in the public interest. This proposal does not deliver affordable or environmentally responsible housing and serves primarily private commercial interests. It fails to align with the objectives of the Housing SEPP 2021, the Coastal SEPP 2018, and the Northern Beaches Community Strategic Plan 2040.

7. Requested Determination

I respectfully request that the Department:

1. Refuse SSD-76220734 due to its non-compliance with the EP&A Act 1979, Housing SEPP 2021, Coastal SEPP 2018, Northern Beaches LEP 2011, and DCP 2019; or
2. Require a comprehensive redesign that:
 - Reduces height, scale, and excavation depth;
 - Improves BASIX and sustainability outcomes;
 - Demonstrates no-worsening overshadowing or privacy impacts;
 - Retains and protects existing trees and deep-soil landscaping;
 - Is subject to review by an Independent Design Review Panel; and
 - Undergoes renewed community consultation with an extended exhibition timeframe.

8. Conclusion

As both a resident and property owner directly affected at 1 Loftus Street and 143 Ocean Street, I strongly oppose this proposal. It represents an over-scaled and environmentally risky development that is inconsistent with the established planning framework and contrary to the public interest. I urge the Department to refuse the application in its current form to preserve the integrity, character, and safety of the Narrabeen community.

Signed,

Darren Geros

Resident & Property Owner

1 Loftus Street and 143 Ocean Street, Narrabeen NSW 2101