Re: Objection to Proposed Development
Application: SSD-76220734. – 156–164 Ocean Street, Narrabeen

Dear Sir/Madam,

I wish to formally lodge an objection to the proposed development at 156–164 Ocean Street, Narrabeen. My concerns relate to the *Visual Impact, Height, Traffic, Tree Removal, Flood Risk*, and, in particular, the proposed *senior units' pricing*, which is inconsistent with the financial capacity of the local community.

Visual Impact Assessment

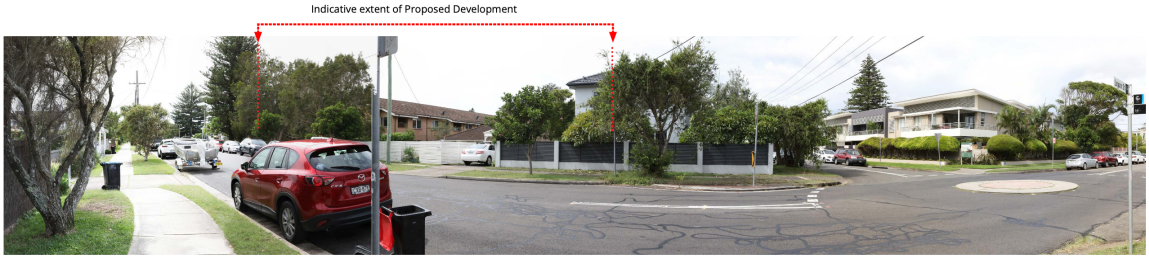
The Visual Impact Assessment "A37_Visual Impact Assessment_156-164 Ocean St Narrabeen.pdf" fails to accurately represent the true scale, height, and visual impact of the proposed development within its surroundings:

- This report does not clearly show the building's full height from all picture viewpoints. To provide a fair and transparent assessment, the structure should be depicted as a solid rectangular mass superimposed onto the corresponding photographs. This approach would allow the community to better understand the full visual impact of the proposal on their residential houses and local area. Today's technologies make this an easy possibility.

- Landscape photographs on pages 28, 32, 36 have the tops of the Norfolk pines cropped, creating a psychological visual distortion that gives the false impression that the proposed building is significantly lower than its actual height. This manipulation diminishes the viewer's natural sense of scale and further underrepresents the true visual impact and dominance of the development within its surroundings. Examples below;

Existing View

Existing View



Existing View

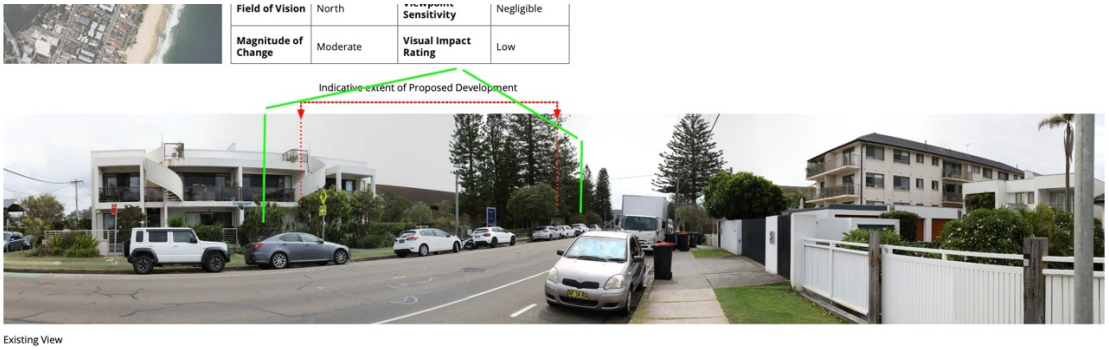
When reviewing the pages of the document, several inconsistencies become apparent:

- The ‘existing views’ for each viewpoint, when compared with the ‘Indicative Extent of Proposed Development’ (shown by the red dotted line areas), do not accurately align with the scaled architectural elevation drawings.
- When these are compared against the retained 20m Norfolk pines and neighbouring buildings, a clear and significant discrepancy is evident in how the proposed development’s height and massing are represented.
- All Norfolk pines should be shown in full view (not cropped), as cropping diminishes the viewer’s ability to judge the building’s true height and scale.
- Presenting the development in this way would provide a far more realistic and transparent representation of the building’s actual height, bulk, and overall visual impact within the streetscape.
- Comparing the architectural plan elevations against the ‘Indicative Extent of Proposed Development’. the should more accurately correspond to the areas represented by the green line overlays. Example images below:

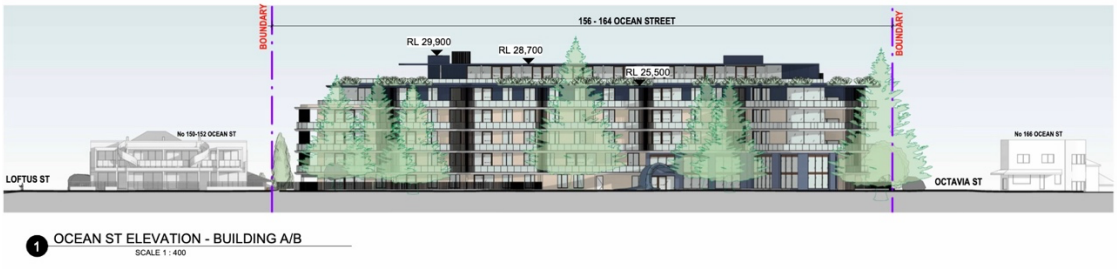
View 2 - Corner of Octavia Street and Ocean Street (page 28)

Existing View

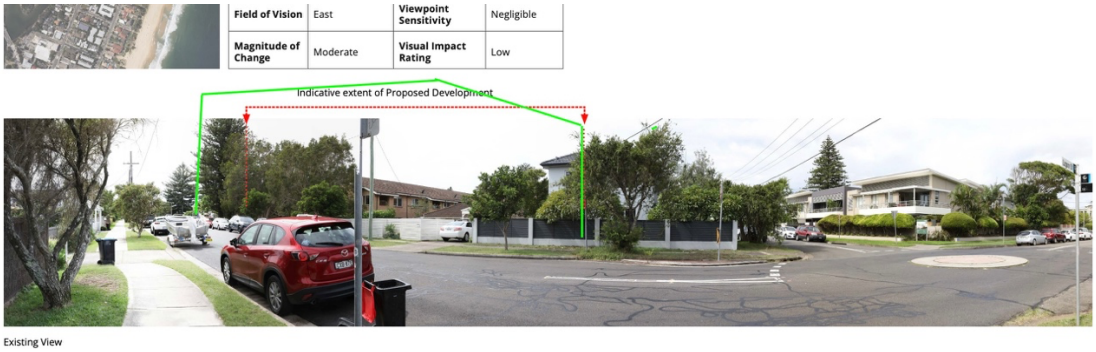
View 4 - Ocean Street (page 32)



Existing View



View 5 - Lagoon Street (Page 36)



Existing View

The Visual Impact Assessment report should be revised with accurately scaled, non-distorted image overlays, showing the building as a solid mass from all relevant viewpoints, including all four streets surrounding the block.

- Additionally, 10 of the 13 Visibility Analysis ‘View Point’ images appear to have been taken in panorama mode, which distorts vertical and horizontal lines and produces curved perspectives that do not reflect human vision and scale. Although the document went to great lengths stating on Page 11(with examples) that the photos used in the document have been montaged, this is inaccurate. Had this montage mode (flat, stitched images) been used throughout the document, all straight lines would remain true to form unless the structure or line was genuinely curved in real life. The use of panoramic images therefore misrepresents how the buildings will actually appear from most viewpoints shown in this document. Two clearly shown examples of distortions include:

    - Picture View 2 sample – Corner of Octavia Street and Ocean Street (pg 28): The road and double white road line appears curved, indicating distortion from panorama mode.

Existing View

- Picture View 4 sample – Ocean Street (pg 32): The building on the left-hand side appears curved and distorted, which would not occur in flat montage picture. The road curb is curved even though this road is straight.

Existing View

- The image provided in the architectural plans (below) understates the height of the proposed 20 m building. The perspective appears angled from the ground, giving the impression the new development is only about half the height of the neighbouring building at 150 Ocean Street, which has a parapet height of 7.5 m. Visually, this makes the new building appear only slightly taller than its neighbour, when in reality it is nearly three times taller, reaching 20 m.

The above points collectively demonstrate that the report provides a misleading portrayal of the building's true visual impact. The Visual Impact Assessment Report should be revised to include accurately scaled, non-distorted images that depict the building as a solid mass from all relevant viewpoints, including all four streets surrounding the block. This would give the community a clear and realistic understanding of the scale and extent of the proposed development's impact on the local streetscape.

Traffic

Ocean Street and Lagoon Street are narrow local roads already experiencing significant congestion—particularly on weekends, during peak summer, and during surf life-saving events.

The proposed development would exacerbate this congestion, compromising safety for pedestrians and cyclists and making it more difficult for emergency vehicles to navigate. The allocation of only seven visitor parking spaces for approximately 159 residents is wholly inadequate and will increase on-street parking pressures.

Additionally, the Traffic Impact Assessment (Ref. 24139, Indigo by Moran, 14 July 2025) was conducted on Tuesday, 20 August 2024, which does not reflect the high-traffic periods experienced in summer or during many local events. The study should be repeated on a weekend during peak summer to capture realistic traffic conditions**.**

Shadowing

Shadowing: Due to the 20m height of the proposed building the adjoining residential properties to the south in Loftus street will have very limited sun in their backyards throughout the winter months. Although the building is stepped back from the share boundary it would be more appropriate to have a lower building height on the south side of the property to allow for the Loftus street houses to have sun in their backyards in winter.

Height

The height of the proposed development is completely out of character with its surrounding environment, where nearby unit buildings are generally limited to three storeys. A development of this scale would integrate far more appropriately into the local context if it were restricted to a maximum of four storeys. Larger and higher-density developments of this nature should be confined to the designated town centre areas identified by the State Government as places for future growth, where the supporting infrastructure and planning controls are designed to accommodate them. Narrabeen is not one of these town centres.

Privacy

Due to the substantial height of the proposed building, significant privacy issues will arise for surrounding residents. Occupants of the new development will have direct views into the private open spaces of neighbouring single-dwelling homes. The architectural plans show minimal use of

privacy screens, and most windows appear to lack any effective privacy treatments to prevent overlooking into adjacent properties.

Residents along Lagoon Street will be particularly affected, as the proposed building is positioned only 4.5 m from the Lagoon Street boundary, with balconies extending to within just 1.226 m of the boundary. This proximity will result in severe overlooking and a complete loss of privacy for those properties.

Similarly, residents along Loftus Street, whose homes back directly onto the proposed development, will experience considerable privacy intrusion due to the building's height, massing, and close setback.

Tree Removal and Environmental Impact

The proposal includes the removal of 30 mature trees, including Norfolk Island Pines.

According to the Environmental Impact Statement (Document: 251002_EIS_156-164 Ocean St, Narrabeen, page 1):

"The Pines are not just an environmental or design factor – they were identified by the First Nations group who were consulted on the site as increasingly important to Indigenous peoples as locale identifiers for their community."

The Norfolk Pines along Lagoon Street hold equal cultural, environmental, and visual significance as those on Ocean Street and should be retained.

Flood and Coastal Hazard Risk

The site is located within a flood-prone and coastal erosion hazard area, as identified in EIS Appendices E and F with significant water table issues. The development footprint encroaches into areas classified as high hazard under the Northern Beaches Council Flood Study and Coastal Zone Management Plan.

The EIS provides only minimal mitigation measures, such as standard floor height adjustments, which are inadequate given Narrabeen's increasing vulnerability to sea-level rise, storm surge, and extreme weather. In particular, the proposed basement levels are unsafe and should not be permitted in flood-prone zones.

Senior Unit Pricing and Community Impact

The proposed senior units are priced starting at A$3 million, while the average Northern Beaches home sold by seniors is approximately A$2.7 million, creating a shortfall of ~A$300,000, not including transaction costs, stamp duty, legal fees, or moving expenses.

Many local seniors are asset-rich but cash-poor, with wealth primarily tied up in their homes. Significantly, a large proportion of these seniors were not part of the compulsory Superannuation Guarantee (SG) system, which only started on 1 July 1992. For those who were, initial contributions were minimal (3% of earnings), far below current levels. As a result, many Northern Beaches retirees have relatively low superannuation balances and limited capacity to fund high-

cost senior units, especially when factoring ongoing expenses such as strata fees, maintenance, and living costs.

Based on local demographics and financial capacity:

- Only 10–20% of seniors are likely to be able to purchase these units at the minimum of $3 million. So this makes less than 10% of seniors could afford these apartments.
- The vast majority of the target demographic would find the development financially inaccessible.

A development with a lower price point would be far more consistent with the financial realities of the local community, allowing local seniors to remain in the area and fostering a socially inclusive and connected neighbourhood.

Conclusion

I wish to formally lodge an objection to the proposed development at 156–164 Ocean Street, Narrabeen. My concerns relate to the Visual Impact, Building Height, Traffic and Parking, Tree Removal, Flood Risk, and, in particular, the pricing of the proposed senior units, which is inconsistent with the financial capacity of the majority of the local elderly community.

To better align with the surrounding built environment and maintain the character of the area, the proposed development should be **reduced by two to three levels**, allowing it to sit more comfortably within the streetscape and avoid becoming visually and socially polarising to the local community.

For all the reasons outlined above, I strongly object to the proposed development in its current form. I urge the **NSW Department of Planning** to:

1. Require a **revised Visual Impact Assessment** featuring accurate, non-distorted images that correctly represent the building's scale and height.
2. Require a **traffic and parking study** to be conducted during **peak summer weekends**, when the area experiences its highest congestion levels.
3. **Retain all significant mature trees**, including the **Norfolk Island Pines**, which are environmentally, visually, and culturally important to the local area.
4. **Reconsider the pricing structure** of the proposed senior units to ensure they are financially accessible to the broader senior community, rather than limited to the wealthiest 5% of Northern Beaches residents.
5. **Eliminate basement levels** from the design, as they are inappropriate for a site identified as **flood-prone** and within a **coastal hazard zone**.

The combination of **visual, environmental, traffic, flood, and affordability concerns** makes this development unsuitable in its current form.

Thank you for considering my objection.

Yours sincerely

Citations & Footnotes

Senior Unit Pricing and Community Impact:

1. **Introduction of the Superannuation Guarantee (SG)**
    - The Superannuation Guarantee (Administration) Act 1992 came into force on **1 July 1992**, creating the employer obligation to contribute to superannuation. Federal Register of Legislation+3Parliament of Australia+3APRA+3
    - The initial mandatory contribution rate was 3% of eligible earnings. APRA+1

    Footnote: Many seniors today therefore did not benefit from long-term higher contribution rates, which supports the "asset-rich but cash-poor" statement.

2. **Median house price on the Northern Beaches**
    - A recent source reports that the median house price in the Northern Beaches region is approximately **A$2,500,000** as of July 2024. NE Aspect, Buyers Agent Northern Beaches+1

    Footnote: While this figure does not specify "sold by seniors", it demonstrates the high home values in the area and underpins the assertion that seniors' wealth is largely tied in home equity.

3. **Low superannuation balances for retirees**
    - Data notes that Australians aged 65–69 have a superannuation average balance of around **A$420,936** (as of March 2025). News.com.au

    Footnote: This supports the claim that many retirees have "relatively low superannuation balances," especially when compared to very high housing values.