

The Secretary

Department of Planning, Housing and Infrastructure

Re: Objection to SSD-76220734- 156 Ocean Street, Narrabeen

Author: Dr Craig Blount, Adjunct Professor

Dear Sir/Madam,

My name is Craig Blount. Since 2012 my family and I have lived at 51A Lagoon St, Narrabeen, which is located 140m south the proposed development. I am a concerned resident that wants to protect the local Narrabeen peninsula from inappropriate development. I strongly object to the proposed development at 156 Ocean Street, Narrabeen, given the adverse outcomes it would bring to the Narrabeen peninsula's existing residents and to the character of the local area. Below I have provided the reasons for my objection. I have referenced planning policies and instruments where applicable as well as local conditions and constraints and I have highlighted where the EIS is inadequate.

I have focused on two main issues with the proposal: (1) the incompatibility of the proposed building height with the local character of the Narrabeen peninsula, and (2) the social impact the development would have on current residents given its potential to significantly impact already severely constrained street parking.

Key Issue (1) The incompatibility of the building with the local character of the Narrabeen peninsula

The SEARS for this EIS provide clear guidance to those preparing the EIS as to the content of the EIS and the topics it must address. SEAR no.6. *Built Form and Urban Design* requires the proponent to:

- *Demonstrate how the proposed built form (layout, height, bulk, scale, separation, setbacks, interface and articulation) addresses and **responds to the context, site characteristics, streetscape and existing and future character of the locality**. Where relevant explain and illustrate the application of any bonuses under an EPI, and*

- *If relevant, provide an assessment of the development against:*

- o *the design principles for seniors housing set out in Schedule 8 of State Environmental Planning Policy (Housing) 2021 (Housing SEPP) and the Seniors Housing Design Guide.*

- o **the design principles for residential apartment development set out in Schedule 9 of the Housing SEPP** and the Apartment Design Guide (ADG).

This should include a table which demonstrates how each dwelling (including affordable dwellings) performs against the ADG design criteria.

I understand that the majority of the proposal is to be 'seniors housing' and *Schedule 8 s97(1) 'Design principles for seniors housing' of SEPP (Housing) 2021* provides the rules by which the proponent of such developments must recognise the current character of a location.

s97(1) Neighbourhood amenity and streetscape, indicates that

Seniors housing should be designed ...—

*(b) to **recognise the desirable elements** of—*

*(i) **the location's current character**, or*

*(d) **to maintain reasonable neighbourhood amenity and appropriate residential character** by—*

*(iii) **adopting building heights at the street frontage that are compatible in scale with adjacent buildings.***

The built form and height of surrounding buildings throughout the Narrabeen peninsula define its local character. The area of the Narrabeen peninsula in the vicinity (a few hundred metres) of the proposal includes a mix of free standing houses and 2 storeys unit blocks. There are also some 3 or 4 storey buildings in this area, which were presumably built prior to the current height restriction, but these buildings make up only a small proportion of the total buildings in this area. The *Warringah Local Environmental Plan 2011* 'Height of Building' maps indicate the maximum building height for dwellings on the Narrabeen Peninsula in the area between Wellington Street and Malcolm Street must be 8.5m (i.e. 2 storeys) (Figure 1).

I note also from the Community Engagement Report that the community feedback in relation to the development's theme of being 'Low-Scale and a Neighbourhood Fit' was the importance of "Size or scale of buildings (height) so that it blends with the surroundings (not overscale)." "Keeping it low, not too highrise." That report also indicated that Council was concerned about the out of character height of the proposed building.

It is also worth noting that Narrabeen was excluded from recent NSW government housing reforms that now allow 4-6 storey developments within 800m of town centres. The proposed Indigo development in its current form would be better suited to the other areas, rather than Narrabeen, where the zoning allows for greater building heights. I understand that the planning reforms were designed to strike a balance so that growth was encouraged in some areas but preserve the unique environment of the northern beaches in others, such as Narrabeen. The Indigo proposal is not compatible with these planning reforms.

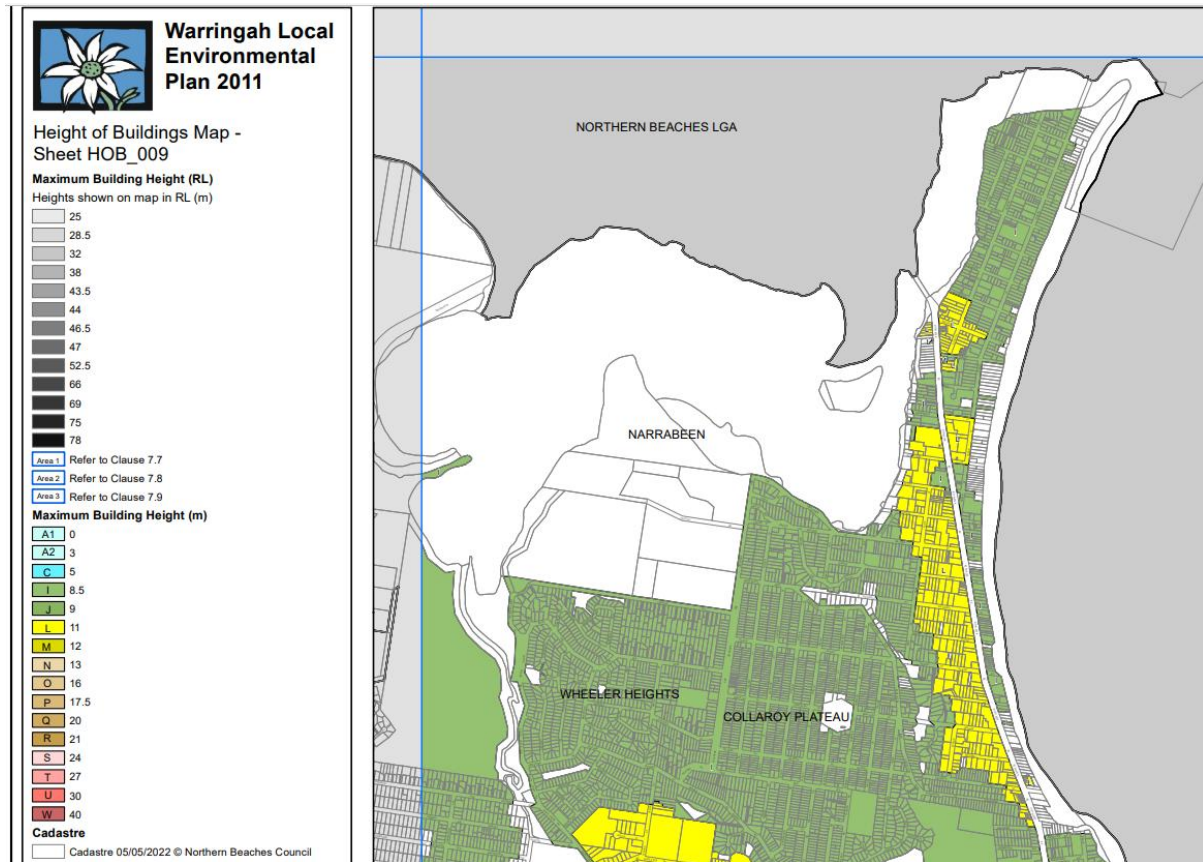
In contrast to local character, the Indigo proposal includes plans for 5 stories of residence and a 6th for rooftop use. This is generally 3 times the height of the surrounding buildings throughout this area of the Narrabeen Peninsula.

This is incompatible with State Environmental Planning Policy (Housing) 2021 s97(1) b(i) and d (iii) and would not comply with the requirement of SEAR no.6.

Recommendation: That the consent body requires that the proposal is modified to be compatible with guidance for Seniors Housing and local character by requiring

the number of storeys (building height) to be reduced from 6 storeys to 2 or 3 storeys.

Figure 1: Warringah LEP 2011 Height of Building maps for the Narrabeen Peninsula



Key Issue (2) The social impact the development would have on current residents given its potential to impact street parking

Current space available for street parking

Street parking on the Narrabeen peninsula in the area between Wellington Street (300m to the south of the proposal) and Malcolm Street (400m to the north of the proposal) is scarce, particularly after 5pm (when residents return from work) and on weekends (when visitors use the beach). Hence, it is not unreasonable to consider street parking in this area to be 'at or near full capacity' at these times. To illustrate this please review the photos below (taken at 5pm Sunday 26/10/2025) which show no available parking spots close to the proposal site i.e. on Lagoon St (looking north and south from the roundabout at Loftus St) and looking east along Loftus Street from the roundabout at Loftus St.

My personal experience with street parking is that when I do need to park on the street (i.e. when my two car spots at my dwelling are already taken), then finding a parking spot can be difficult. This is particularly more so after 5pm (when residents return from work) and on weekends. In the many instances where I could not find a park, I had to park many hundreds of metres from my dwelling. I suggest that if residents in the Narrabeen peninsula were asked about their key issues with living on the Narrabeen peninsula, that most would answer that it was 'parking'. Yet, for whatever reason, this has not come through in the EIS documents, in particular the 'Social Impact' Study and is not mentioned in the 'Community Engagement Report. The Community Engagement Report states that "*engagement allows the community to highlight potential impacts of the project on the community, or of possible impacts on the project from the community and surrounds. This process empowers the community and brings value to the project, allowing the design to be further refined and enhanced, and the negative impacts managed and mitigated.*" I can only speculate that street parking was not mentioned in the Community Engagement Report because the questions were geared towards the requirements of potential buyers into the development rather than the needs of locals who were concerned with impacts of the development. This failing of the Community Engagement Report casts doubt on its content and competence to truly relay community sentiment about this proposal.

Given street parking in the area in the vicinity of the proposed development is considered to be 'at or near full capacity' during the evenings and weekends, then the risk of the proposed development not having sufficient car spaces for its residents and workers should have been given serious consideration in the EIS. Yet, I could only find scant reference to parking in the EIS's Traffic Impact Assessment (i.e. only in relation to SEPP requirements), no address of street parking in the Social Impact study and no reference to it in how the parking arrangements in the proposal complies with ESD. I can only assume that the lack of address of this issue was because those who prepared the EIS did not consider it to be worthy of address.

Parking requirements for the construction workers

'At or near full capacity' street parking in the vicinity of the proposed development poses a great issue during construction given workers will be unable to park if they arrive at times before local residents leave for work and vacate street parking spaces. Even after this time (i.e. after 730am), there would be unlikely to be adequate street parking spaces for the construction workforce. It is understood from the EIS, for example, that at least 60 workers would be needed for the proposed 48 weeks of concreting.

The Traffic Impact Assessment for the EIS, s8.2.8 Construction Worker Parking indicates that *“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.”* This statement seems to infer that parking in the vicinity of the site may be a problem, and if this is the case, why is this potential impact not adequately addressed in the EIS. I would point out that ‘encouragement’ is not a strategy for addressing risk, and relies on the workers playing ball. I also note that the public transport system is geared to travel ‘along’ the northern beaches, not between western Sydney and the northern beaches, where workers in these types of large construction projects tend to be based.

I suggest that even in the very unlikely event that some workers were to catch public transport and the other workers parking requirements (carpooling or otherwise) were timed to fit in with vacated street parking, that there would still be inadequate street parking for these workers on the Narrabeen peninsula within a few hundred metres of the works site.

Parking issues post-construction

As described above, parking is a key issue to current residents and it is also obvious to anyone if they visit the area in times of peak parking need. If an outcome of the development results in impacts to street parking then this would be a ‘significant social issue’. I suggest that this ‘potential significant social issue’ required more than the cursory address it received to address SEARS nos. 15 & 18 (see below).

SEAR 15. Ecologically Sustainable Development (ESD)

Identify how ESD principles (as defined in section 193 of the EP&A Regulation) are incorporated in the design and ongoing operation of the development. •

SEAR 18. Social Impact

The EIS must consider social impacts and, should any significant social impacts be identified, a Social Impact Assessment must be prepared in accordance with the Social Impact Assessment Guideline for State Significant Projects.

The ‘potential significant social issue’ of oversupply of cars to allocated parking in Indigo relative to available street parking space has not been discussed ‘at all’ in the EIS.

The risk that residents in the proposed development require more parking than provided by internal car spaces

The Traffic Impact Assessment for the EIS concludes that *“the proposed parking provision will comply with the SEPP (Housing) 2021 and Council’s DCP criteria and will adequately serve the development”*.

I also note that as part of the proposal, approximately four on-street parking spaces along the affected frontage will be reinstated and the proposal provides 20 motorcycle spaces for residents.

It is understood that the developers propose to provide 192 parking spaces including 173 for residents (incl.1 for the care bed), 7 for Visitors and 3 for RAC staff. It is acknowledged that the spaces for independent living were allocated based on development standards for seniors living from SEPP 2021 (Section 107 (2) and 108(1) in Division 7, Chapter 3, Part 5), which require at least 0.5 parking spaces for each bedroom. For this development there are 44 x 2B independent units; 58 x 2B + study independent units; 47 x 3B independent units, which sums to 345 bedrooms in the independent living part of the development and based on this, the developer proposes to provide the minimum requirement car spaces (172).

I note the *SEPP (Housing) 2021 s108 Non-discretionary development standards for independent living units—the Act, s 4.15*

(1) The object of this section is to identify development standards for particular matters relating to development for the purposes of independent living units that, if complied with, prevent the consent authority from requiring more onerous standards for the matters.

(2) The following are non-discretionary development standards in relation to development for the purposes of independent living units—

(k)....at least 0.5 parking spaces for each bedroom

It is understood that by meeting these requirements, the consent authority cannot refuse the development on the basis of not providing adequate internal car space as guided in the SEPP. Notwithstanding, I contend that the consent authority must still consider the risk to ecologically sustainable development (ESD) of not having adequate internal car space for the real needs of Indigo residents. Inadequate internal car space would create competition between current residents and Indigo residents for street parking. As indicated above, I contest that this potentially significant social impact is an issue that has not been addressed in the EIS in the Social Impact Study. Given that it would not be consistent with the principles of ESD, it should also have been addressed in the ESD assessment.

Therefore, the EIS has not adequately addressed SEARS no. 15 & 18. This failing of the Social Impact Assessment and ESD Assessment to flag and address the potential risk of the Indigo proposal to the their potential residents and local residents of inadequate street parking space for all casts doubt on the content and competence of the EIS to truly address key risks from this proposal.

I provide further local context as to why I contest that the potential social impact would be a real impact if only 172 allocated spaces are provided for independent living.

Although the 172 allocated spaces for independent seniors living comply with the minimum requirement, they will not necessarily meet the total need of the residents that will move into the Indigo development. I have collected data for two large apartment complexes on Lagoon St and Ocean St within 150m of the proposed development. The parking and vehicle data for these blocks are as follows:

- 134-138 Ocean St- 57 bedrooms, 37 cars, 31 parking spaces for residents. This means that there are 0.65 parking spaces for each bedroom requiring 16% of the residents' cars must park on the street.

- 53-55 Lagoon St- 38 bedrooms, 30 cars, 20 parking spaces for residents. This means that there are 0.79 parking spaces for each bedroom and at least 33% of the residents' cars must park on the street.

If we look at the average parking need for bedrooms from these two blocks it equates to 0.72 per bedroom. This is much greater than 0.5 parking spaces per bedroom considered by the proponent to be sufficient for the Indigo proposal. I note that for these blocks, the residents must park some cars on the street because there are not enough internal car spaces and I contend that this is a common phenomena for unit blocks in the Narrabeen peninsula that has already led to competition for all for available street parking.

If 0.65-0.79 parking spaces per bedroom is more realistic to the needs of the Indigo residents in independent living then that development would need between 253-296 car spaces for the independent living residents and between 52-125 cars would need to park on the street. This would be unsustainable given street parking is already at or near full capacity. I acknowledge that these sampled unit blocks are not 'seniors living' but a fair proportion of these residents are over 60 years in age (i.e. also seniors), and as such, they provide good guidance for the real parking needs for the future residents of the Indigo proposal. These other blocks also have under 17s with no cars.

The application of 0.5 car spots per bedroom may meet the realistic needs of seniors living developments in other parts of Sydney but given the proposed high price tag for Indigo apartments suggests the developer is marketing to people of medium to high socio-economic status (who would most likely each own a car) then the allocated internal car space requirements per bedroom will fall short of the realistic need by a large margin. This comparative analysis seems to suggest that the street parking needs of Indigo independent living residents will result in significant conflict with current local residents for the very limited amount, if any, available street parking spaces, which would be a 'significant social impact'. As indicated above, SEAR 18. Social Impacts- states *"that The EIS must consider social impacts and, should any significant social impacts be identified, a Social Impact Assessment must be prepared in accordance with the Social Impact Assessment Guideline for State Significant Projects."*

That this significant social impact has not been considered in the Social Impact Assessment, or the ESD assessment, and is hence, a severe failure of the EIS.

I also suggest that the 7 allocated visitors spaces will often be oversubscribed, and add further pressure to street parking.

Recommendation: That DPHI requires that the proposal is modified so that there is adequate internal parking space for the residents in independent living, so that the need for street parking is avoided. This could be done by retaining current plans for the 3 x basement floors and 173 parking spaces for residents, but reducing the overall number of bedrooms (and floors in the building) so that realistic parking needs of Indigo residents are more likely to be met. Existing information for local apartments blocks is a better guide to the realistic parking needs for current residents in the local area and suggests that the need is between 0.65-0.79 parking spaces per bedroom, not 0.5.

Photo 1. Looking south along Lagoon St from the roundabout at Loftus St



Photo 2. Looking north along Lagoon St from the roundabout at Loftus St



Photo 3. Looking east along Loftus St from the roundabout at Loftus St



Additional Issue: Proximity to catastrophic risks from climate change

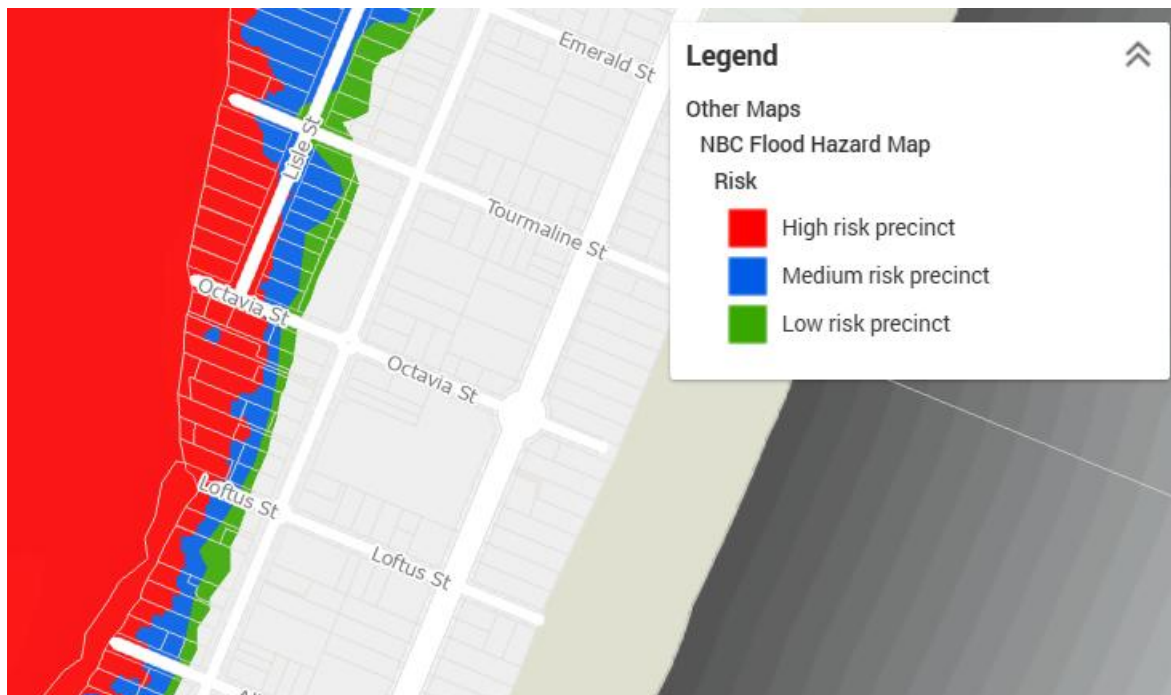
The site of the proposed development sits between mapped areas of flood risk to the west and coastal hazard risk to the east (see Figures 2 & 3 below). It does not seem appropriate to site a proposed development of this magnitude in such close proximity to such vulnerable areas.

I understand that one of the reasons that Narrabeen was excluded from recent NSW government housing reforms that now allow 4-6 storey developments within 800m of some town centres was because of these risks (see above for further information on these planning reforms).

Figure 2: Coastal Erosion/Recession risk lines taken from Figure 23 of the CZMP for Collaroy-Narrabeen beach and Fishermans Beach



Figure 3: Flood risk maps taken from NBC Flood Hazard Mapping



Conclusion

In summary, my objection to the Indigo development is based on issues with it that I contend are key to the well being of local residents: i.e, the poor fit of the proposal to the character of the local area and the likely significant impact of the proposal on the at or near capacity of street parking. I have shown that these issues have been poorly addressed in the EIS, and in some instances not at all, despite clear guidance given in the SEARS regarding how the development should consider local character, social impacts, planning instruments and the principles of Ecologically Sustainable Development. It is not clear as to why they have been overlooked in the EIS (i.e. because the writers of the EIS are naïve and uninformed, or whether these issues have been purposefully overlooked) but regardless, they require better address in the response to submissions. I also contend that these key issues cannot be sufficiently addressed without a substantial modification to the design of the building so that it is reduced to 2 or 3 above ground levels, otherwise the proposal would not comply with the principles of Ecologically Sustainable Development.

I also suggest that the local residents are generally supportive of having more seniors living options in the community as well as care and that we would unanimously support the Indigo proposal if it was done in way that respected the local character of the area and the parking needs of current residents. Unfortunately, what is currently proposed by Indigo is disrespectful to the current residents, local character and planning rules and will cause significant social impact. It is not appropriate to significantly lower the well being of the current residents to make way for the Indigo development in its current form. I hope this submission informs the consent authority of the consequences to current residents of approving the proposed development in its current form.

Dr Craig Blount

A handwritten signature in black ink, appearing to read "Craig Blount", with a stylized flourish at the end.

Adjunct Professor