

Submission – SSD 7622 0734 (Seniors Housing Development, Narrabeen)

To: Department of Planning, Housing and Infrastructure

Re: State Significant Development Application SSD 7622 0734

Subject: Objection to the proposed Seniors Housing development at Narrabeen – excessive scale, non-compliant parking, and infrastructure impacts

1. Introduction

I wish to lodge an objection to the above State Significant Development (SSD 7622 0734) proposed for Narrabeen. My objection relates to the excessive scale, bulk and height of the proposal, the inadequate provision of visitor parking, and the significant impacts it will have on local amenity, traffic, and the coastal character of the area.

2. Visitor parking non-compliance

The application proposes 7 visitor parking spaces for 149 self-contained dwellings. This provision fails to comply with the requirements of the State Environmental Planning Policy (Housing for Seniors or People with a Disability) 2004, now incorporated into the Housing SEPP 2021 (Part 5, Division 5.7, Clause 5.7.7 and Schedule 3), which prescribes:

“A minimum of 1 visitor car parking space per 10 self-contained dwellings must be provided.”

Based on this benchmark, a minimum of 15 visitor parking spaces is required. The proposed shortfall (less than half the standard) cannot reasonably be justified for a seniors development of this scale.

3. Likely impacts of parking shortfall

- Overflow parking: Ocean Street and surrounding residential roads already experience heavy parking demand from beachgoers, residents, and nearby businesses. The development's shortfall will increase on-street congestion.
- Visitor and carer access: Residents in seniors housing typically receive frequent visitors, carers, and medical service providers. Seven visitor spaces are grossly insufficient to support this level of visitation.
- Traffic safety: Increased kerbside parking near driveways and intersections will reduce visibility and safety for pedestrians, mobility-impaired residents, and cyclists.
- Amenity and character: Inadequate on-site parking undermines residential amenity and conflicts with the intent of the Housing SEPP to ensure accessibility and liveability for older residents.

4. Building height, bulk and scale – out of character

The proposed development has six storeys above ground and three basement levels, which is completely inconsistent with the existing built form and character of Narrabeen and Ocean Street. There are no buildings of comparable height or massing within at least a kilometre of the site. The area is characterised by low-rise dwellings (1–3 storeys) and small-scale residential buildings with landscaped setbacks. The proposed scale will dominate the streetscape, disrupt view corridors, and significantly alter the coastal village character that defines this part of Narrabeen. Under the Northern Beaches Local Environmental Plan 2023, the typical height limit in this locality is 8.5 metres (2–3 storeys). This proposal greatly exceeds that scale and would set an undesirable precedent.

5. Coastal character and visual impact

The site sits directly opposite Narrabeen Beach, within a visually sensitive coastal environment. A six-storey structure will create visual intrusion and overshadowing along the foreshore, conflicting with the NSW Coastal Management SEPP and its objectives to protect scenic coastal character and public views. The bulk and height of this building are incompatible with the open, low-scale, beachside context. The development will be visible from Pittwater Road, Ocean Street, and the coastal walkway, creating a harsh urban wall effect rather than blending with the natural landscape.

6. Traffic generation and inadequate infrastructure

The proposal's 149 dwellings plus staff, carers, and visitors could generate up to 300 additional cars using Ocean Street daily. Ocean Street is narrow, with limited parking and constrained intersections. Local roads already experience congestion during weekends and peak hours due to beach traffic. No supporting road or intersection upgrades appear to be proposed to handle this additional load. Emergency vehicle access may also be compromised due to limited turning space and parking pressure. The cumulative impact on public transport, drainage, waste collection, and pedestrian safety has not been adequately addressed.

7. Inconsistency with local planning intent

The proposal is inconsistent with the desired future character outlined in the Northern Beaches Local Strategic Planning Statement (LSPS) and the Narrabeen Local Centre Plan, which emphasise maintaining a low- to medium-density coastal village identity, preserving coastal views, and encouraging developments sympathetic to surrounding built form and infrastructure capacity. This SSD proposal directly contradicts those strategic directions.

8. Requested action

I respectfully request that the Department of Planning:

1. Require the applicant to amend the proposal to provide at least 15 visitor car

parking spaces (or 1 per 10 dwellings) in compliance with the Housing SEPP; and

2. Substantially reduce the building height and scale to align with surrounding low-rise character; or
3. Refuse the application unless compliance with these standards and contextual considerations can be demonstrated.

9. Conclusion

This development's excessive height, bulk, and parking shortfall are inconsistent with State and local planning policy, detrimental to coastal character, and inappropriate for the needs of seniors and their visitors. I urge the Department to uphold the Housing SEPP standards and ensure fair, accessible, and sustainable outcomes for the Narrabeen community.

Yours faithfully,

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