

To:

Department of Planning, Housing & Infrastructure
Attention: Major Projects – Najeeb Kobeissi

Project Reference: SSD-76220734

Subject: Objection – Indigo by Moran, 156 Ocean Street, Narrabeen

From:

Katja Sannen
Resident, 4/168 Ocean Street
Narrabeen NSW 2101

4 November 2025

To whom it may concern,

I am a resident of 4/168 Ocean Street, which is located directly behind the proposed Indigo by Moran seniors living development at 156 Ocean Street. Although there is one row of residential dwellings between our property and the development site, the height and bulk of the proposal will have a tangible impact on sunlight access, privacy, and neighbourhood character.

I support well-planned and inclusive housing for seniors within our community, but this proposal is excessive in height and scale, inconsistent with the local context of Narrabeen, and lacks affordability and accessibility for the broader senior population. My objection focuses on direct residential amenity impacts as well as broader social, environmental, and infrastructure considerations.

1. Height, Scale, and Character

The proposed development reaches up to 21.1 meters (approximately 6-7 stories), far exceeding the 12.3-metre maximum building height permitted under the Northern Beaches Local Environmental Plan (WLEP 2011) for the R3 Medium Density zone. Even allowing for the 3.8-metre bonus available under the Housing SEPP for seniors housing, the proposal substantially breaches acceptable limits.

The Urban Design Report (A35) acknowledges that the surrounding built form is predominantly 1–2 storeys with occasional medium-density buildings, and that a sensitive transition is required to maintain the coastal village character. The proposed scale and massing are inconsistent with both the Seniors Housing Design Guide (2023) and the

Northern Beaches Development Control Plan (DCP) objectives to ensure new development complements local character and provides an appropriate transition to adjacent dwellings.

Without sufficient setbacks or modulation, the development will dominate the Ocean Street ridgeline and overshadow adjoining low-rise homes, undermining the visual balance and established rhythm of the area.

2. Overshadowing and Privacy Impacts

Although a single row of dwellings separates my property from the site, the proposal's 5–6 storey form may still cast substantial shadow across those backyards and into ours. The Urban Design Report notes that the southern interface requires careful treatment; however, the current design includes extensive glazing and balconies overlooking the rear boundaries. This will materially erode privacy and daylight for residents of both the intermediate and rear properties, including ours.

Even if the overshadowing technically complies with minimum daylight requirements, the lived experience will be a marked reduction in light quality and a diminished sense of openness. Greater upper-level setbacks, privacy screening, and landscaping buffers are essential to mitigate these impacts.

3. Setbacks, Landscaping, and Tree Canopy

The Urban Design Report and Landscape Plans indicate a minimum 1.1-metre setback along Lagoon Street – a sharp contrast to the prevailing 5–6-metre rhythm of surrounding properties. This minimal setback fails to allow for deep-soil zones and adequate canopy tree planting.

The removal of mature trees along Lagoon and Octavia Streets will significantly alter the visual softness of the streetscape. Replacement landscaping will take years to mature, leaving residents exposed to an overbearing built form. This approach is inconsistent with the Seniors Housing Design Guide requirement that setbacks be designed to provide visual relief, privacy, and canopy contribution.

4. Excavation, Groundwater, and Environmental Risk

The Geotechnical Report (A19) confirms that the proposal includes three basement parking levels, extending below the natural water table. Dewatering and ongoing groundwater management will be required, with further hydrogeological assessment recommended before construction. The proximity to Narrabeen Lagoon and the known coastal groundwater conditions heighten the risk of subsidence or drawdown impacts to neighbouring dwellings.

Given these risks, the proposal should not proceed without a detailed and independently reviewed groundwater impact study and an adaptive management plan approved by WaterNSW and Council.

5. Traffic and Parking Pressures

The Traffic Impact Assessment (A34) identifies 192 on-site parking spaces (178 residential, 7 visitor, 4 EV, and 3 staff). With a single access point via Lagoon Street—a narrow local road already constrained by on-street parking—the projected traffic generation during construction and operation will exacerbate local congestion and create potential safety issues for pedestrians and cyclists.

Visitor, staff and utility vehicle parking provision is insufficient for a complex of this scale, and overflow into nearby streets is highly likely. Additional independent review of the traffic and parking model is recommended.

6. Community, Social Benefit, and Affordability

The Social Impact Assessment (A31) confirms the proposal will replace the former Wesley Taylor Village (which contained 74 aged-care beds and 24 retirement units) with 149 independent-living units and 10 assisted-care suites. This represents a significant reduction in residential aged-care capacity within the Northern Beaches, shifting the project's focus from care-based to lifestyle-oriented seniors living.

The developer's own marketing presentation (October 2025) describes Indigo by Moran as a "premium boutique collection of extra-large retirement apartments" priced from \$1.565 million for 2-bedroom and \$2.165 million for 3-bedroom units, with monthly fees of \$1,100–1,500 and a 30% deferred management fee on exit. These prices exceed the Narrabeen median of \$1.23 million (2-bed) and \$2.13 million (3-bed) by 25–80%.

This pricing places the development well beyond the reach of average income earners or modest downsizers, and therefore fails to align with the Housing SEPP objective to provide inclusive housing that meets the needs of vulnerable members of the community.

While there is value in high-quality retirement housing, the affordability profile and financial model—including substantial deferred management fees and capital retention clauses—limit accessibility and constrain residents' ability to fund future care. The social benefit claimed in the EIS is therefore overstated.

7. Infrastructure Capacity and Construction Impact

The development's density and 3-level basement design will intensify demand on water,

sewer, and energy networks already under pressure in this part of Narrabeen. The Infrastructure Report (A22) acknowledges a need for coordination with Sydney Water and Ausgrid, yet no confirmed capacity upgrades are provided.

Additionally, the developer's construction timeline projects completion in 2028, implying several years of sustained building activity, noise, dust, and heavy-vehicle movements in a tightly constrained residential pocket. These temporary but significant disruptions have not been adequately mitigated in the Environmental Impact Statement.

8. Requested Actions

I respectfully request that the Department:

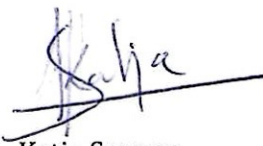
1. Refuse the application in its current form; or
2. Require substantial redesign to:
 - Reduce building height and mass to within the LEP control of 8.5 m plus any justified SEPP allowance, bringing it to 12.3m;
 - Increase setbacks and deep-soil zones consistent with the local pattern (5–6 m);
 - Introduce setbacks and screening to preserve privacy and solar access;
 - Complete an independent groundwater and hydrogeological study;
 - Review traffic and parking capacity independently;
 - Provide clear commitments to affordable and inclusive seniors housing outcomes or alternative community benefits.

9. Conclusion

While I appreciate the need for seniors housing, the Indigo by Moran proposal, as currently designed, is excessive in scale, inadequately responsive to its coastal village context, and misaligned with the affordability and inclusivity principles set out in the Housing SEPP and Seniors Housing Design Guide.

I urge the Department to require meaningful design amendments and affordability commitments before considering approval. A more balanced, community-oriented outcome would ensure the project genuinely serves the seniors of Narrabeen without compromising the amenity and character of our neighbourhood.

Kind regards,



Katja Sannen
Resident, 4/168 Ocean Street
Narrabeen NSW 2101