7/150 Ocean Street, Narrabeen, NSW, 2101

3 November, 2025

Re: SSD-76220734 Indigo by Moran - 156 Ocean Street, Narrabeen

To whom it may concern,

I am writing to convey my **STRONG OPPOSITION** to the proposed development at 156 Ocean Street, Narrabeen.

The proposal has been submitted as a State Significant Development. This development bears **NO SIGNIFICANCE FOR THE STATE OF NEW SOUTH WALES**, its residents or infrastructure. This SSD application is a blatant attempt by developers to bypass local planning and environment laws, and should be seen as such.

The development proposes a significant increase in the height of the building above existing restrictions. While these restrictions may be relaxed with justification, the developers have provided no such justification. The development provides **NO BENEFIT TO THE LOCAL COMMUNITY**; it will only add to the profits of greedy developers. Therefore, relaxation of the restrictions imposed by the existing SEPP and DCP are NOT WARRANTED.

My property at Unit 7, 150-152 Ocean Street is my major asset and forms a large part of my retirement plan. The loss of light and privacy, combined with the increase in traffic will see SEVERAL HUNDRED THOUSANDS OF DOLLARS wiped off the value of my property, while greedy property developers rake in millions.

My objection to this development centres on two major concerns, being the height of the proposed structure impacting loss of solar access and privacy. Additional significant concerns include impact on parking and traffic in the area.

#### Loss of solar access

The application states that the south side of the proposed development has been pushed back to limit solar loss. While this is true for one small part of the development it is not true for the southeast corner of the development which is using the existing building footprint. Therefore, an increase in height will substantially increase solar loss. The shadow diagrams provided show a considerable increase in shading over the property at 150-152 Ocean Street. There are major impacts to the back yard, clothesline and individual units, including indoor and outdoor areas.

Page 55 of the Visual Impact Assessment clearly shows how overbearing the development will be for the surrounding properties, including 150-152 Ocean Street. The development represents a substantial loss of blue sky outlook for the surrounding properties. The photomontage pictures

show the building as a grey amorphous mass against a grey sky. They do not adequately demonstrate the full visual impact of glass, balconies and gaudy blue tiles/paint. The actual vista will be an eyesore which dominates the skyline of the Narrabeen peninsula. It is noteworthy that nearly all other buildings along Ocean Street are neutral colours.

### **Privacy**

Privacy is a major concern. Units along the southern side of the proposed development will look straight into the bedrooms of the units at 150-152 Ocean Street, which are mostly comprised of full-width floor to ceiling glass. There is currently screening from some large trees, but they are unhealthy and nearing end of life. When they are removed, there will be no protection, and six storeys of windows and balconies will have unobstructed views into the bedrooms of 150-152 Ocean Street.

Additionally, any lots on the third floor or above (including the rooftop terrace) will have unobstructed views on to my roof top terrace. This represents a significant loss of privacy to an area where my young nieces could be sunbaking or entertaining friends.

#### **Parking**

The proposed car parking facilities are completely inadequate. In the Traffic Impact Assessment, Section 5: Parking Assessment, paragraph 5.1.1 states that the Northern Beaches Development Control Plan does not specify parking rates. **THIS IS FACTUALLY INCORRECT**. Appendix 1 of the Northern Beaches DCP mandates 1.2 spaces per 2-bedroom unit, 1.5 spaces per 3-bedroom unit and one visitor space per five units. This means that a minimum of 223 parking spaces is required for the proposed number of units.

Should the developers continue to argue that the proposed development, being 'Seniors Housing', is not specifically addressed in the DCP, I would point them to Part C Siting Factors - C3 Parking Facilities - paragraph 4, which states that when carparking rate is not specified, carparking must be adequate for the development, taking into account the objectives and requirements of the clause. I would argue that the proposed development is residential housing (regardless of whether the developers have made up a new category of 'Seniors Housing') and should be subject to the requirements of the Northern Beaches DCP in its entirety.

In reality, most retired couples will have access to two vehicles. Even allowing for only 50% having two vehicles will require 225 parking spaces to be provided, plus additional visitor parking which will need to be more than the four spaces and three disabled spaces proposed. The parking allocation proposed by the developers could support 90 units at most.

The parking situation on residential streets on the Narrabeen peninsula is currently above capacity. Any development that does not provide adequate parking for ALL vehicles will only add to the already overstressed situation.

### Traffic

Section 6.5 of the Traffic Impact Assessment states that the bus stop at Ocean and Octavia is dangerous. Nearly all bus stops along Ocean Street are on corners. Neither Northern Beaches

Council nor Transport for New South Wales have at any time expressed safety concerns or taken any action to correct any dangerous situation.

Notwithstanding that there is only one bus movements per hour (Traffic Impact Assessment Table 4-3) that would only stop for a few seconds, if at all. The developers propose moving the bus stop south (taking away existing street parking) and replacing the bus zone with a 'No Stopping' area (not replacing the lost parking spaces). This will effectively give the proposed development exclusive access to the entire street frontage at the cost of other residents.

The Preliminary Construction Traffic Management Plan is completely unrealistic. It proposes truck access via Lagoon and Ocean Streets with a circular pattern (utilising Loftus Street and Octavia Street) in a clockwise direction for trucks departing and an anti-clockwise direction for trucks approaching. This will mean that the side streets will have trucks passing in opposite directions. Even the most cursory investigation would show that ALL side streets between Wellington Street in the south and Malcolm Street in the north are barely a car width wide. Trucks will not be able to use them in ANY direction. In addition, trucks will not be able to approach the site along Ocean Street from the north due to narrow streets and load limitations.

Overall, the Traffic Impact Assessment is woefully inaccurate and requires substantial revision. For example:

- Table 4-1 lists Wakehurst Parkway as 2 lanes in each direction. THIS IS FACTUALLY
   INCORRECT as Wakehurst Parkway is one lane in each direction.
- Section 4.6 shows the crash history for the area. The listing of two (2) incidents DOES NOT
  CORRELATE with the extensive list of incidents that Northern Beaches Council recently
  presented to residents when considering reducing speed limits on the Narrabeen
  peninsula.
- Section 4.7 presents justification for the development based on traffic flows for Pacific Highway.
- Of the dozens of intersections in the area, including major branching points, Table 4-7 lists just two (2) intersections, one on Pittwater Road and the other a roundabout on back streets. This is clearly a subversion of the facts in order to present a favourable picture. Any resident can tell you that these are the intersections of least concern. Significant congestion occurs around the intersections at Pittwater Rd/ Wakehurst Parkway, Pittwater Road/Ocean St, Pittwater Rd/Gondola St, Pittwater Rd/Garden St. These are the local intersections that need to be included in a Traffic Impact Assessment.
- Under Section 8.3.1 it appears the developers are not planning to notify the residents of the adjoining properties on Loftus Street of the commencement of construction.

It is clear that whoever wrote the Traffic Impact Assessment had never visited the site nor even bothered to look at Google Maps. I recommend that the current SSD not be considered until an accurate Traffic Impact Assessment is provided.

## Social

Another of the government's priority projects is the provision of social and affordable housing. The current development proposal does not make any provision under this priority.

# Summary

While I appreciate the government's prioritisation of medium and high-density housing, the Narrabeen peninsula is two blocks wide and cannot physically support any additional development. Approval of this application will have disastrous effects on the area, and I implore the Department to reject this application.

Steven Faddy

3 November, 2025

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