

Objection to Proposed Development

Indigo by Moran – 156 Ocean St Narrabeen

1. The State Significant Development assessment should adhere to local planning rules

The development may technically have been deemed a State Significant Development; however, 149 retirement units in an exclusive beach-side location do not seem to be significant in the broader context of the aging NSW population. The key beneficiary of this proposed development seems to be the developer (Moran) and its shareholders in maximising its profitability and this should not necessarily be the State's objective. This site is prime real estate in an exclusive Northern Beaches Council (NBC) governed area that should be assessed like any other development in the area in accordance with local planning regulations such as height restrictions. The development is VERY significant to the local residents, but it is relatively insignificant in terms of NSW state planning/housing goals.

I therefore primarily object to this development being deemed a state significant development and request that:

- its planning assessment be either handed back to the NBC,
or
- at the very least be strictly subject to the NBC planning rules.

2. The development is clearly oversized and not within keeping with the local area housing

3. The development is not appropriate for the local environmental area

The entire area is a sand spit that according to now better understood coastal land environmental building studies, should never have been developed in the first place, being subject to dune movement, beach erosion and lake flooding, and these environmental threats will increase over the coming 50 years with expected sea level rise. Therefore, any re-development in this area should be kept to a minimum. In the case of the proposed development however the basement level is nearly a meter below ADH sea level, being nearly 3m below king tide level and more than 3m below regular flood event levels of Narrabeen Lake. On a block made completely of sand to well below sea level (as attested in the development's own geotechnical report), this design is destined to fail within the life of the development.

Having previously lived on the 2nd floor of 149 Ocean St, I have appreciated many sunsets over the existing aged care facility. All residents on Ocean St between Loftus and Octavia - even 3rd floor West facing units will completely lose the ability to enjoy their sunset views if the development proceeds as proposed. One of the joys of living on the Narrabeen Peninsular is the unique temperate micro-climate with plentiful sun in winter and the beautiful Northeasterly sea-breeze in summer - all residences on Loftus St between Ocean and Lagoon Streets (particularly those on the Northern side, as attested by the development's own shadow diagrams) will lose both of these priceless attributes to some extent if the development proceeds as proposed. In a similar manner to this, even many of the residents of the proposed development themselves, due to the sheer size and bulk of the development and many South facing or other aspects who's Northern aspect is blocked by other parts of the building(s), will not even get the benefit of these local environmental treasures and will therefore need to rely heavily on heating in winter and air conditioning in summer.

It goes without saying that the Lagoon St residents opposite the proposed development would also miss out on their morning sun, potentially devastating for the sun loving people generally attracted to living in the area.

4. The development is not appropriate as NSW works towards net zero

For the reasons stated at point 3. above and due to the very high number of residents, the development will be energy intensive and the heating and air conditioning requirements will not be appropriately served by the relatively meagre solar arrays proposed (in fact the development's infrastructure report does not even account for the solar power leading me to believe that the arrays are only included as a token gesture, but not to actually assist in powering the site's power needs). Perhaps more importantly, as fossil fuel powered passenger vehicles are being quickly phased out here on the Northern Beaches, over the next 10 to 15 years, the 192 car spaces and the development's infrastructure report are unbelievably under-resourced for the EV charging requirements associated with a development of this size.

Only 30amps are allowed for EV charging for 192 car spaces of a newly proposed development – that's enough for just two (2) fast-chargers.

In just 15 years (2040) 50% of all passenger cars are expected to be EV's with 70% to 100% of all new car sales being EV by then. Residents of a development such as this will have difficulty buying a suitable car.

The development even proposes to move the existing bus stop on Ocean Street from the exiting adjacent location to somewhere else – who do they think they are! Surely the bus stop should be a key asset to a retirement living and as we move towards net zero public transport should be encouraged and the bus stop should be upgraded and incorporated into the development plans. (Note however that I am not suggesting that such a change would be enough to make me support the development).

5. The proponent's intent should not be assumed to be benevolent

While I respect the developer in its efforts to provide high quality aged care and retirement living solutions for aging Australians, it should be noted that this has also proved to be an extremely lucrative sector for developers and service providers.

The above considerations seem to suggest that the proponent's proposed design:

- is optimised for maximum their profits with little regard for other matters,
- does not prioritise the benefits to its own residents,
- does not provide any benefit to neighbouring residents,
- is not appropriately aligned with the future planning requirements of NSW, and
- does not appropriately account for the future success of the development itself.

I therefore do not trust that the proponent will act in good faith regarding any matter associated with the proposed development and in my opinion nor should any assessment of their intent. For this reason, I revert to my request made at point 1; that the proponent be required to strictly adhere to all NBC local planning rules, without exception (and for the avoidance of doubt this includes height restrictions).

Summary of Request:

Please block this development from proceeding or require that the proponent radically re-design the development such that it is in keeping with the housing in the immediately surrounding area and strictly compliant with NBC planning rules.

I would be willing to discuss any aspect of this objection with either the proponent or any planning official if requested in due course.

deeply concerned

Mitchell Blyth
Warriewood NSW