

To: Najeeb Kobeissi, NSW Department of Planning, Housing and Infrastructure

Via: NSW Planning Portal – Major Projects

Re: State Significant Development (Seniors Housing) at 156–164 Ocean Street, 81–81A Lagoon Street & 8 Octavia Street, Narrabeen NSW (Indigo by Moran)

Submitter

Name: Dirk Hastenrath

Address: Unit 4, 168 Ocean Street, Narrabeen NSW 2101

Summary Position

I object to the proposed seniors living development on the grounds of:

- excessive height and bulk relative to the established coastal character;
- traffic and parking pressures on Ocean, Lagoon and Octavia Streets; and
- incomplete critical impact assessments demonstrating acceptable or no impact on neighbouring properties and the residential coastal character.

In my view, the application does not convincingly meet the objectives of the Northern Beaches LEP/DCP or relevant seniors-housing design principles.

I understand and support the need for more housing in the Northern Beaches area, including appropriate seniors housing. New developments, however, should respect the medium-scale coastal character of the neighbourhood and demonstrate compliance with applicable controls. On the information available, this proposal does not do so.

Site & Context

- **My property:** Unit 4, 168 Ocean Street (same street; short walking distance from the site).
- **Surrounding character:** Mixed low- to medium-scale coastal residential with significant Norfolk Pine canopy along Ocean Street.
- **Topography/orientation:** Coastal frontage with fall towards Narrabeen Lagoon; coastal wind exposure; potential overland flow paths.
- **Sensitive receivers:** Nearby apartments and dwellings on Ocean, Lagoon and Octavia Streets; public open space and coastal promenade.
- **Vegetation/water:** Mature Norfolk Pines on frontage; proximity to Narrabeen Lagoon and foreshore.

Primary Concerns

- Overall size and height of the development is out of character with the coastal streetscape and appears inconsistent with applicable height controls;
- Groundwater level changes and construction-stage risks from deep excavation potentially affecting neighbouring properties;
- Traffic and parking impacts not sufficiently assessed; and
- Several impact assessments deferred to Construction Certificate (CC) stage—these should be completed before determination and form part of public consultation.

Detailed Grounds of Objection

1) Incompatibility with local coastal character / Height controls

The multi-lot development produces a continuous, tall frontage to three streets. Upper-level stepping and setbacks appear insufficient to transition to nearby 1–3 storey buildings. The resulting building would dominate the streetscape and reduce the area's open coastal feel. Publicly available material indicates a maximum height of about 21.1 m (≈ 6 storeys) at the highest point.

My understanding of the applicable controls is that the base LEP height in this locality is 8.5 m, with an additional seniors-housing allowance under the SEPP of approximately 3.8 m, taking the effective control to around 12.3 m. On that basis, the proposed height would be more than double the surrounding residential scale.

Any variation above relevant height parameters for seniors housing should clearly satisfy Clause 4.6(3)(a) of WLEP 2011 with site-specific environmental planning grounds, not generalised project benefits, and demonstrate that the objectives of the height and zone provisions are achieved. The proposal should also be tested against the R3 zone objectives for a landscaped setting and high visual quality, not merely numeric compliance. Profit maximisation and unobstructed ocean views from the roof terrace are not sufficient grounds for an exemption from prevailing control limits of that magnitude.

Based on public material, the project includes 149 apartments with a published mix of 44 x 2-bed, 59 x 2-bed + study, 39 x 3-bed and 7 penthouses, plus 10–12 high-care suites, and three basement levels. This intensity increases the risk of visual-privacy loss from high-level balconies and noise/overlooking from communal areas—again symptomatic of excessive height and bulk compared with surrounding buildings.

I respectfully request reductions in overall height consistent with current controls and seniors-housing provisions (i.e., an effective maximum around 12.3 m), with stronger upper-level setbacks

2) Trees, deep soil and landscaping

Three basements constrain deep soil and threaten existing canopy (including Norfolk Pines) that contributes to the coastal character and shade. Setbacks to Lagoon and Octavia Streets are reported as little as ~1.1 m in places, which compromises planting space and canopy retention.

3) Traffic, access and parking

The development will increase vehicle trips and turning movements on Ocean, Lagoon and Octavia Streets where congestion and on-street parking pressure already occur. Driveway locations near intersections and pedestrian crossings to the beach warrant careful assessment. This is particularly critical because many pedestrians are children moving between the beach and the corner shop at Ocean St/Octavia St, and during summer months the area is used by tourists and beachgoers unfamiliar with local conditions.

Plans/Traffic Report figures indicate around 192 on-site car spaces, while marketing suggests private double garages for each of the 149 units (i.e., up to 298 resident spaces), creating a discrepancy that needs clarification. Only a small number of staff spaces appear to be provided, further increasing pressure on on-street parking.

Overall, I feel that there is a lack of clarity and cohesion from the developer on the topic of parking, and so further information is required before impact on the community can be accurately assessed.

I respectfully request that a robust Traffic, Access and Parking impact analysis be undertaken (and exhibited) to allow the community to understand the likely impacts and proposed mitigations.

4) Flooding, stormwater and coastal hazards (including groundwater)

Given the proximity to Narrabeen Lagoon and known overland-flow paths, I am concerned that large impervious areas and basement excavation reportedly extending below groundwater levels could alter local groundwater regimes and increase flood risk to adjacent properties. The EIS appears to defer key hydro-geotechnical work to CC stage (e.g., groundwater monitoring, inflow assessment, dewatering management, and detailed groundwater flow-deformation analysis).

These assessments should be completed and exhibited prior to determination, with independent peer review. Without those, residents are not provided with all critical information to allow a fair impact assessment on their own properties.

5) Essential services capacity (water, sewer, electricity, broadband)

Given 149 units plus assisted-living suites and three basements, the capacity of local water, sewer, electricity and broadband networks should be demonstrated with provider confirmations (Sydney Water/Ausgrid/NBN).

Any approval should be conditioned on written confirmations of spare capacity and delivery of any required upgrades prior to occupation.

6) Community & social outcomes (aged-care provision)

Replacement of the former Wesley facility with predominantly independent-living units and limited care suites may reduce local aged-care bed capacity, negating the benefit the developer claims the building will have on the local community.

I respectfully request consideration of proportional reinstatement of residential aged-care places or a targeted community-benefit contribution to offset this reduction.

Conclusion

While I accept the need to redevelop the site for seniors housing, the current proposal is not ready for approval. Further assessments should be completed and exhibited, and compliance with height/setback controls demonstrated. As a result, I object to the application in its current form.

Kind regards,

A handwritten signature in black ink, appearing to be 'Dirk Hastenrath', written over the closing text.

Dirk Hastenrath