

Submission on the Proposed Development – Indigo by Moran, Narrabeen

From: Jacqui Scruby MP, Member for Pittwater

To: Northern Beaches Council / Department of Planning, Housing and Infrastructure

Re: DA for Indigo by Moran, Narrabeen – Seniors Living Development

Date: 6 November 2025

1. Introduction

As the Member for Pittwater, I recognise and support the need to provide high-quality, well-located housing for older residents so they can remain connected to their community and downsize from family homes. Seniors housing plays an important role in supporting ageing in place, easing pressure on the broader housing market, and providing appropriate care options close to family and support networks. There is no doubt that the location for older people, close to the beach, shops and a friendly community is in many ways ideal.

However, this must be achieved, to the greatest extent possible, within the established planning framework and in a way that respects the existing character, scale, and environmental sensitivity of local neighbourhoods.

Whilst the current proposal for *Indigo by Moran* demonstrates many excellent design features and provides desirable seniors housing, it does not achieve this balance. For example, it will be the first building in the area to exceed 4 storeys.

The proposed height, bulk and intensity of development are inconsistent with the planning controls and established built form of Narrabeen. It would have significant amenity impacts on nearby residents, particularly those along Loftus Street, and represents an overdevelopment of a constrained coastal site.

As a community independent, I stand with the community supporting council-led and community-led development not developer-led development. Whilst both the Labor and Liberal Parties have recently undertaken the biggest pro-developer planning reforms in 50 years to address housing, these should not be at the cost of everything we love about living in our communities. The proposed development is an overdevelopment of the site and one that risks the viability of the Norfolk Pines which are a much loved feature of the area.

Indigo by Moran will be a fantastic contribution to the Narrabeen Community if its design is scaled back to ensure lower heights, tree retention, setbacks and deep soil and increased parking to better align with the existing planning controls and the amenity and character of the area.

2. Neighbourhood Amenity and Streetscape

Bulk, scale and height

The proposed development **grossly** exceeds the maximum allowable heights, even with bonuses under the existing planning controls. At approximately 21 metres in height, the proposed building exceeds:

- The 8.5 metre limit under the LEP, by which all local developments are controlled, by a substantial margin; and
- The 12.3m permitted under the SEPP (Housing for Seniors or People with Disability) 2004 which includes the 9.5m with the additional 3.8m height allowance.

The proposed height is not a minor variation—it nearly doubles the maximum permitted height even with bonuses and introduces a scale entirely at odds with the established low-rise coastal character of Narrabeen. Even where apartments have been built in the R3 zone, these are mainly 2-3 storeys high and are narrow, rather than bulky, wide buildings (as shown in Urbis report). This development's bulk and height together means it is dramatically more oppressive and impactful than existing multi-storey dwellings. The extreme height also undermines the setbacks, making even compliant setbacks redundant because they are inherently related to the height of the building.

The proposed scale and height commensurates the size of the development site and differs from the surrounding residential typology

Along Loftus Street, residents will experience a profound change to their local environment. The height and massing of the building will dominate the streetscape, casting long shadows and eroding the sense of openness and coastal light that define the area. Rather than integrating into its setting, the building would visually overpower it.

Setbacks and transition

I note that some setbacks are consistent with the planning scheme but that those setbacks are directly related to height. If the building height was within planning controls the setbacks would be appropriate but are now insufficient as the proposed building height has increased. Particularly on Lagoon Street, the setbacks are inadequate to provide a meaningful transition between the proposed structure and surrounding residential dwellings and streetscapes. Without sufficient setbacks - **relative to height**, modulation or stepping down in height, the development reads as a monolithic wall, resulting in visual bulk and overlooking impacts.

The lack of articulation and boundary relief also fail to reflect the desired future character for this R3 zone, which is one of moderate density with landscaped setbacks and generous deep soil areas to support the highly valued trees.

3. Retention of Trees, Deep Soil and Landscape Character

The proposal involves the removal of most existing mature trees on the site. These trees make a significant contribution to the local landscape character, providing canopy cover, privacy screening, and a sense of green separation between properties. Further efforts should be made to retain trees, particularly given the LEP's Schedule 6 - Preservation of Bushland considerations.

Narrabeen's tree canopy at 17.9%, is already below the Greater Sydney target which is to increase Sydney's tree canopy by 40% by 2036. The further loss of established trees undermines both environmental and community wellbeing outcomes.

It should also not be assumed that because trees aren't cut down they will survive. Deep soil zones are critical for maintaining tree growth, managing stormwater, and supporting biodiversity. The extensive excavation for three basement levels will almost entirely eliminate deep soil areas and compromise the ability to replant meaningful vegetation, and therefore supports the need for greater setbacks.

This outcome directly contradicts the objectives of the SEPP and LEP to retain significant trees and provide deep soil planting in sympathy with the streetscape and local ecology and minimising the built form impacts.

4. Environmental and Geotechnical Considerations

The site is located within a coastal environment and sandy soil area, conditions that require particular care in design, excavation and drainage. Extensive basement construction in such a location raises serious concerns regarding:

- Groundwater intrusion and dewatering,
- Potential instability of surrounding land,
- Increased risk of erosion and settlement, and
- Impacts on nearby riparian systems and water quality.

Given these constraints, the scale of the proposed excavation and construction appears unsuitable for the site conditions and inconsistent with best practice for development in sandy coastal soils.

The site lies within a coastal environment underpinned by sandy soils and is subject to potential wave impact, reduced foundation capacity, and erosion risk. These are not minor factors—they are specifically recognised in the Warringah Local Environmental Plan 2000 – Schedule 13 (Collaroy/Narrabeen Beach Development Guidelines), which applies to properties within the Collaroy/Narrabeen Hazard Line Maps (A1 8634, Sheets 1–3).

Schedule 13 requires that development in this area be regulated to reduce the risk of damage to buildings, trees and works from coastal processes, and that Council take into account both the Collaroy/Narrabeen Coastline Management Plan (1997) and the State Government's Coastline Management Manual (1990).

The *Indigo by Moran* proposal, involving extensive excavation, three basement levels and a multi-storey structure, risks being inconsistent with these guidelines. It introduces considerable risk given the site's sandy foundation, proximity to coastal hazards, and reduced soil stability. Allowing such a large-scale structure in this sensitive location would contradict the intent of Schedule 13 to ensure that new development respects the limits imposed

by the local geology and coastal hazard environment.

Additionally, I note the NSW Government's 2023 Disaster Mitigation Plan which identifies the Northern Beaches Council LGA as having the highest average annual loss from extreme weather and climate impacts of all the LGAs in NSW by 2060. That cost is anticipated to be \$969m AAL with \$867m AAL from coastal impacts alone. As outlined in the Urbis report, this site is on an extremely low lying area, opposite Narrbeen Beach.

Given these constraints, the scale of the proposed excavation and construction appears unsuitable for the site conditions and inconsistent with best practice for development in sandy coastal soils.

5. Respect for Planning Controls and Community Expectations

Planning controls exist to ensure that development occurs in a way that maintains the liveability, environmental quality and visual harmony of our suburbs. The 8.5 metre height limit in this part of Narrabeen reflects a conscious planning decision to preserve the area's coastal character, manage environmental risk, and protect residents' amenity.

While the SEPP (Housing for Seniors or People with a Disability) 2004 provides flexibility to encourage aged housing, this flexibility must not be used to circumvent or effectively nullify the intent of local planning controls.

Narrabeen was specifically excluded from the 2025 Low-Medium Residential (LMR) Stage 2 reforms, which allow up to 21 metres in height in other locations. To now permit this development would undermine that decision and the integrity of the local planning framework, setting a precedent for further inappropriate scale and overdevelopment in the area.

6. Amenity Impacts on Loftus Street Residents

I have met with residents to understand their concerns and visited one of the properties on Loftus Street that will be impacted by the proposed development. I share their concerns particularly regarding gross exceeding of building height, deep soil/setbacks, overshadowing and privacy. In the premises I visited - the garden, dining and living area are completely open to the subject land. The existing buildings have been designed to ensure there is sufficient solar access, no privacy issues and sufficient setbacks for vegetation. However the proposed designs - which do not abide by height requirements, therefore undermining the appropriateness of setbacks, will have devastating impacts to the way families use their home. From dramatic drop in solar access to feelings of invasion of privacy with multiple units looking directly, at short distances into gardens and living areas where children will be playing.

Residents along Loftus Street will be disproportionately affected by:

- **Overshadowing** of living areas and private open space;
- **Loss of privacy and visual outlook;**
- **Increased traffic and parking pressure** from residents, staff, and visitors; and

- **Construction impacts** associated with deep excavation and truck movements over an extended period.

These impacts are unreasonable and inconsistent with the SEPP objective to maintain reasonable neighbourhood amenity and appropriate residential character.

I note the Urbis report's comments in relation to developments, such as that proposed, which exceeds the Baseline Building - *"Future building envelope should carefully consider the overshadowing impact to the properties on 3-9 Loftus Street and to avoid any additional overshadowing when compared to those created by the compliant baseline envelope."*

7. Conclusion

There is clear community and Council support for more seniors housing on the Northern Beaches, but it must be appropriately scaled, environmentally responsible and consistent with planning controls. The *Indigo by Moran* proposal does not meet these criteria.

It represents an overdevelopment of a sensitive coastal site, with excessive height and bulk, inadequate setbacks and deep soil, and a failure to retain mature trees and neighbourhood character. The environmental risks associated with extensive excavation in sandy coastal soils further reinforce that this site is unsuited to such an intensive form of development.

For these reasons, I respectfully urge that the application be refused in its current form, and that designs reflect lower height, consistent with

- 8.5m height limit and other relevant planning controls;
- Retain significant trees and provide adequate deep soil planting;
- Respect the amenity of neighbouring residents; and
- Deliver a form of seniors living that is sustainable, human-scaled, and sympathetic to the Narrabeen context.



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