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Sent: 3/06/2025 9:31:20 PM
To: DA Submission Mailbox
Subject: TRIMMED: Online Submission

03/06/2025

[REDACTED]

RE: DA2025/0173 - 142 Ocean Street NARRABEEN NSW 2101

[REDACTED]

Submission Objecting to DA2025/0173: 140-142 Ocean Street, Narrabeen

Northern Beaches Council
Attention: Development Assessment Team

I write to lodge my formal objection to Development Application DA2025/0173 for the demolition of existing structures and construction of a residential flat building at 140-142 Ocean Street, Narrabeen.

After reviewing the submitted plans and reports, I have significant concerns regarding the proposal's non-compliance with the Warringah Development Control Plan 2011 (WDGP 2011), the Apartment Design Guide (ADG) under the State Environmental Planning Policy (Housing) 2021, and its broader community and environmental impacts.

1. Non-Compliance with Warringah DCP 2011 - Building Height and Massing

Clause D6.10 - Building Envelope and Height:

The site is located within a 2-storey zone under the DCP; however, the proposed building is effectively three storeys, relying on the site's fall to justify the additional height centrally. This represents a clear breach of the intent of the height control designed to maintain the low-scale coastal character of Narrabeen.

Even if compliant with the LEP numerical height standard, the additional storey breaches the DCP's desired future character provisions, which must be respected under Section 4.15 of the Environmental Planning and Assessment Act 1979.

2. Non-Compliance with ADG - Solar Access and Communal Open Space

ADG Objective 4A-1 (Solar Access):

The development fails to comply with the minimum 70% standard for solar access. Approximately 18% of apartments receive no direct sunlight in midwinter, exceeding the permitted 15%. In a coastal location, solar access is critical for resident amenity.

ADG Objective 3D-1 (Communal Open Space):

The development fails to provide communal open space, allocating roof areas to private terraces (APT 06 & 07) rather than shared facilities. This contravenes the guideline for 25% site area and diminishes shared resident amenity.

3. Loss of Visual and Acoustic Privacy

ADG Objective 3F-1 (Visual Privacy) and WDCP D6.17 (Privacy Provisions):

Several balconies, notably APT 09's, are set back only 4.5m from the boundary - a non-compliant distance of 6m.

This results in direct overlooking into neighbouring private spaces at 134-138 Ocean Street, severely impacting privacy.

4. Neighbourhood Character and Streetscape Impacts

WDCP D6.9 (Neighbourhood Character):

The proposed bulk and scale, combined with reduced setbacks, are incompatible with the existing low-rise, landscaped character of Ocean Street. The development appears overly dominant and visually intrusive.

5. Failure to Address 'Response to Country' Principles

The application does not adequately integrate Response to Country principles, missing the opportunity to respect Aboriginal cultural heritage and the local coastal environment, which is contrary to the Council's sustainability and reconciliation goals.

Given these significant issues, I respectfully request that Northern Beaches Council refuse DA2025/0173 or require substantial amendments to bring it into compliance with planning controls and community expectations.

Thank you for considering my submission.

Best regards,

