

STATE SIGNIFICANT DEVELOPMENT APPLICATION SSD-93020230
40-48 REDAN STREET, MOSMAN NSW 2088

I am a long-term resident of Mosman. The Mosman Council have had strict rules and regulations regarding residential developments, for good reason, to ensure that the environment and amenities are protected for all residents. Many of my neighbours in Mosman are seriously apprehensive and deeply worried about the impact of new State Government legislation regarding residential developments in established suburbs like Mosman. We welcome measures to improve housing availability and affordability, but we do not believe the evidence supports this will be achieved by high rise (9+ floors).

Mosman is a leafy harbourside suburb close to the CBD and as such, land values have escalated greatly in the last 30 years. This means that ANY development is going to be very expensive and the dwellings will have a high sale price, often well outside of the means of an average person, young or old. This is precisely what makes Mosman attractive to developers. In addition, Mosman has many homes and other landmark aspects classified as of 'heritage' significance.

The NSW Government's SSD is designed to speed up the supply of housing in Sydney. Most reasonable people would accept that Sydney requires more housing. The issue is the interpretation of the primary reasons for **this** SSD by developers and the flagrant attempts to bypass key requirements and hoodwink the many who may think this is an opportunity to increase their chances of acquiring a home.

What is at stake?

High rise, twin tower apartment buildings of up to **12 stories high**, containing 53 apartments, is to replace five Federation period homes on Redan Street. The height above street level of this building will be 35 meters, **5 times** greater than current planning rules allow. This is going to make this development the tallest building in Mosman between Spit Road and Balmoral Beach. Current Mosman development rules restrict homes to 8.5 meters. This block will be **four times** higher. Under current Mosman prices, a penthouse will sell for around \$20 million.

a. **The Developer cleverly stacks 5 concessions to produce a result no single policy anticipated**

A 12-storey building is not a low- or mid-rise development in any conventional planning sense. It will be **high rise**. The NSW Government's Low and Mid-Rise Housing Policy is supposed to address the shortage of 'middle' housing. The NSW Government frequently refer to 'mid-rise housing' as between 2-6 storeys. How does a 12-storey build fit into this Departmental policy?

Even after the developer uses all the concessions, the in-fill affordable housing incentives (30% height uplift) plus Clause 4.6 variation plus the SSD pathway, it is not enough, I believe, to approve this unconventional, bulky development. The Land and Environment Court has confirmed that Clause 4.6 variations require substantial site-specific environmental planning reasons and not just public benefit intensions. This was clearly demonstrated by the failure of this test in the conclusion reached in the SSD-97528708 pertaining to the 160 Oxford Street, Paddington development.

b. **Luxury housing paraded as a low-income housing scheme**

Who exactly will this 'affordable' housing development serve? What will these apartments rent for? What will they sell for? No guidelines have been developed. Land values in Mosman are very high, and this carries through to the price of rentals and sales. One-bedroom apartments in rundown buildings in Mosman can rent from \$600 to \$650 per week. In better buildings, for \$1,000 per week.

How can apartments in this development be classed as 'affordable' housing? The numbers need closer scrutiny. The NSW Infill Affordable Housing guidelines allow a 30% height increase provided 15% of the apartments are "affordable" for a minimum of 15 years. After this period the developer can offer these for sale on the open market. As stated by other interested parties, the developer's own Social Impact Assessment states there are only 31 affordable rental dwellings in the Mosman LGA and that the majority of residents in Mosman who claim to be under 'rental stress' cannot find places to live. Where is the modelling that **shows** what income level will qualify, what these 11 units will rent for and the proportion of very low-income people able to afford to rent an one of these 'affordable' dwellings.

Given the size of the 42 remaining apartments ranging from 129 to 321 sqm, with magnificent views of Balmoral beach, under current Mosman housing prices, this will be a **luxury**, prestige residential development, with penthouse choices possibly hovering around \$15-\$20 million asking price each. I refer you to the development on Redan Street called Redan Lane currently being completed. These apartments (3 bedrooms, 2 bathrooms, 2 car spots) are in this price range. This applies to the larger apartments (3 bedrooms and penthouses in 'Reverie', a complex currently being constructed near Mosman Council chambers) sold off the plan with sales values up to \$18-20 million. The price point of these and other newly constructed apartments in the Mosman LGA, makes it difficult to convince anyone that many flats in the proposed development will be affordable to many, let alone those with lower incomes.

It is clear, when objectively assessed, the 11 dwellings that are "affordable" for 15 years only, is not an adequate justification for a massive, uncharacteristic 12-storey building on a 2 storey street. As stated above, this proposal is for a prestige, luxury residential development and the 11 token affordable flats is not at the heart of this design. It is the **key** that unlocks a height to 'big money' developers that would not typically be approved.

c. **Access for 8 of the 11 "affordable" dwellings are restricted to rear access on Redan Lane**

This development directs the majority of the 'affordable' residents to a rear access. This arrangement is commonly referred to as "poor door", prohibited in other major cities in the world. It discriminates against lower income renters and reinforces deep-rooted social division. Thus the 'affordable' housing criterion used as a major justification for the development's size and scope, questions the validity of this as **the key** objective of the NSW Department of Planning and of the developer.

Using Redan Lane as a pedestrian access by low-income renters is also problematic. It is unpaved, narrow and has no footpath or adequate lighting. This is just poor planning and a potential safety issue for these lower income residents, many of whom may be shift workers returning home during the dark.

d. **Is Mosman really a 'transport hub'?**

The State Government has concluded that Mosman is a 'transport hub' and this is a key reason to accelerate significant, large-scale residential developments by using the State Significant Development (SSD) pathway. Mosman has a range of transport challenges. Thus, allowing massive, overpowering developments as that proposed under SSD-93020230 using this as a criterion is shortsighted indeed.

As a Mosman residents will tell you, there are limited transport options for the following reasons:

- i. **Bus services are at capacity** during peak demand periods. Local infrastructure is overstretched and an ineffective hub for high-density living. B1 buses starting at Mona Vale are full at peak periods when they reach Spit Junction and there are long queues. The same applies to the 100 buses from the number of ferry ports, Mosman Bay and Taronga Zoo.
- ii. **Ferry services are limited.** They do exist, they are not high-volume transport options, confined to specific areas of the suburb.
- iii. Importantly, **there is no rail infrastructure.** Mosman is not on a train or metro line, unlike designated "transport hubs" like St Leonards or Sydenham, targeted for rezoning as high-density by the NSW State Government.

- iv. **Geographic Focus:** Cremorne Town Centre is frequently referred to as a true "transport hub" not the entirety of the Mosman residential area.
- v. **The car is king:** Many residents rely on private vehicles for the reasons mentioned above. That is why the label 'transport hub' is misleading. Mosman transport options are often considered by residents as inadequate and unreliable, requiring long walking distances to use, up steep hills.

e. **The bulk and visual impact of the development is dramatically understated as is the potential damage caused by the construction itself**

The size and bulk of this development will result in a 'wall' of development, a continuous frontage taking up the entirety of the site. The Environmental Impact Statement (EIS) own Visual Impact Assessment admits that the impact on neighbouring properties will be "severe to devastating" nevertheless concluding that this is acceptable.

How can this be a rational, acceptable planning justification? The NSW Government will alienate many of their loyal supporters not just residents like us who will suffer great emotional stress resulting from this decision.

Previous developments on Redan Street are **documented** to have caused structural damage to existing properties. The underground parking for 106 vehicles will require extensive, deep excavation: two full basement levels across, close to 3,300 sqm, into sandstone, thereby altering the natural ground plane and replacing gardens with hard surfaces.

It has been pointed out by others that the EIS does not adequately address the risk of such a huge excavation. There is no assessment of the potential damage to existing heritage homes, no statements of legally binding assurances being required from the developer regarding vibration monitoring, dilapidation surveys and liability for damage caused.

f. **Inadequacy of Environmental Impact Statement (EIS) and the actual site conditions, leading to drastic, permanent loss of privacy and light due to overshadowing; also volume of artificial light generated**

The NSW Government's EIS fails to consider the cumulative overlooking from multiple levels of balconies and other rooms (the majority of which will be facing east) into the homes and gardens of properties on the lower side of Redan Street and down Balmoral Avenue. Of course, this overlooking will be applicable to all 42 apartments facing east above ground level. There will be no escaping for residents of the peering eyes for of this development. The mid-slope position of the building will exacerbate the overlooking and visual dominance of this proposed building.

Given the height and size of this proposed building, another major concern among residents is the potential reduction in light, and especially sunlight, from overshadowing. Also, the volume of artificial light that will be generated by so many tenants in so many high-rise apartments is a major concern for lower lying and 2 storey residences.

g. **Five Federation dwellings gone forever, and the value of adjacent, remaining heritage properties diminished**

The upper side of Redan Street is well known for its heritage value and traditional Federation homes. The dwellings to be demolished are prime examples of this important historical part of Mosman's character.

40 Redan Street, Federation, c.1902

42 Redan Street, Federation, c.1902

44 Redan Street, Federation Queen Anne, c.1900

Redan Street and its remaining residents will find their entire neighbourhood altered by a massive, luxury, modern (soulless) apartment complex posing as a NSW State Government 'affordable' housing experiment.

h. The developer's "community consultation" is in name only and requires close analysis

The approach of the developer to community involvement is questionable and bordering on deceptive behaviour. In their own documentation they assert that 1,676 postcards were sent to close neighbours of 20-48 Redan Street. There are roughly 50 to 100 households involved. However, no one on our street (Balmoral Avenue) recall receiving this mail. Most residents recall only hearing about the proposed development from the Department of Planning. Those locals that did receive the postcards say it came late the day before the community meeting with the developer, scheduled mid-morning the following day! This was simply not enough time for residents to rearrange their affairs so that they could attend. Is this a deliberate attempt to frustrate residents and by-pass thorny questions?

Mosman Council did meet with the developer in January 2026, and we understand, was confronted by stonewalling and were frustrated in their attempts to gain clarity. All concerns raised from scale, heritage, traffic and proper drainage were equally frustrated. Not one specific answer and no commitment, only a standard response acknowledging receipt of the Council's queries and technical reports. Is this what the NSW Government planned? To alienate local communities by handing developments over to 'big money'?

i. Mosman Council have been excluded from representing local rate payer views

The developer has complete disregard for Mosman, its residents, current or future, or the Mosman Council. The NSW State Government has provided 'big money' the opportunity, through its SSD pathway, to exclude all local interested parties (in particular the rate payers of this Council). The application has now gone directly to the NSW Department of Planning. There is no rate payer consultation, no local Council input, no reference to local planning legislation. The submission portal is the only avenue available for local rate payers like us to have our say. It is important to note the demographic of residents (a large proportion of Mosman residents are elderly and retired) and would find it challenging to navigate the portal etc. It is most regrettable and upsetting given the way in which the State government has handed control over to 'big money' developers.

I am a long-term resident of Mosman and have lived in several areas in this suburb over the last 30 years. The Mosman Council have had strict rules and regulations regarding residential developments, for good reason, to ensure that the environment and amenities are protected for all residents. Many of my neighbours and other acquaintances in Mosman are seriously apprehensive and deeply worried about the impact of new State Government legislation regarding residential developments in established suburbs like Mosman.

j. The 106-carpark provision is not a realistic number for 53 apartments

The developer proposes 106 spots for 53 dwellings, 42 of which fall into the 'luxury' camp with 3 and 4 bedroom apartments. This is not enough and those without adequate parking will try and find spots on surrounding streets. Currently most surrounding streets, Raglan, Redan, Balmoral, Upper Almora, Muston are overparked, especially on summer weekends or by tradesman during the week. This invites motor vehicle accidents and increased wear and tear on these roads. Vehicle overflow from such a massive building will be permanent on narrow, hard to navigate streets not designed for high density living. The single driveway for 106 cars will cause excessive traffic congestion, with additional traffic noise and pollution.

Moreover, during the development all available on street parking will be taken by trades people and construction workers, allowing no spots for residents who have no garage or parking for only one vehicle. This is not hearsay. During recent developments of large dwellings (eg 6 unit building on Redan, a 900 sqm home on Balmoral Avenue, new home being constructed at 35 Redan Street), all available on street parking

are taken **every day**. A massive development at 40-48 Redan Street will ruin the road and block the access of residents to their neighbourhood. Construction access and site deliveries will repeatedly cause congestion on Redan Street which is narrow. And there is no alternative access route for current residents.

Conclusion

As a long-term resident of this suburb and a current rate payer, I urge the NSW Government to take serious note of these objections. The concept of affordable housing cannot be applied to Mosman property, old or new. Whilst the Government's objectives are admirable, property prices in foreshore suburbs are **NOT** affordable to most people. Land values dictate the cost of property and are very high in harbour areas. Touting the size of this development as necessary to help low-income renters is a shortsighted strategy. It hands development over to 'big money' to construct a massive, luxury apartment complex where most dwellings will be out of reach of most people at the expense of current Mosman residents.

Sincerely,
Theresa Crause
19 Balmoral Avenue
Mosman NSW
theresa@crause.com.au
0414 307 011