

Formal Objection to State Significant Development Application SSD-93020230 – 40–48 Redan Street, Mosman NSW 2088

27 March 2026

The Secretary
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square
12 Darcy Street
Parramatta NSW 2150

By Planning Portal / email

Regarding – Formal Objection to SSD-93020230 – 40–48 Redan Street, Mosman NSW 2088 (Mosman Land No. 1 Pty Ltd / Time & Place / FJC Studio / Urbis)

Dear Sir / Madam,

We write as residents of **33 Almora Street, Mosman**, located within the immediate locality of the proposed development at **40–48 Redan Street**.

This submission is made having regard to the matters for consideration under **section 4.15 of the Environmental Planning and Assessment Act 1979**, the Environmental Impact Statement (EIS), supporting technical documentation, and the broader public interest.

Having reviewed the exhibited material in detail, we **object to the proposal** on the basis that:

- the development is **inconsistent with the underlying planning framework**, even allowing for Housing SEPP uplift;
- the **scale, bulk and height exceedances are not justified in a site-specific sense**;
- there are **unresolved and material risks** relating to traffic, excavation, stormwater and construction impacts; and
- the **public benefits relied upon are insufficient to outweigh the permanent environmental and amenity impacts**.

1. Strategic and Statutory Planning Context (s4.15(1)(a) & (e))

A central question for the Department in SSD assessment is not whether development is permissible, but whether **the specific proposal is appropriate for the site having regard to its context, impacts and strategic intent**.

While the proposal relies on uplift mechanisms under the Housing SEPP and Low and Mid-Rise Housing reforms, the development goes materially beyond those settings by:

- exceeding the **uplifted height control (28.6m)** through a Clause 4.6 variation; and
- departing from the **7.2m wall height control**, which is fundamental to the established built form of the locality.

These are not minor technical variations. They are **integral to achieving the proposed yield and bulk**.

In SSD determinations, the Department typically places weight on whether:

“the proposal is acceptable on its merits having regard to the site and its context, not merely whether planning pathways exist to enable it.”

On that basis, the proposal represents a **planning outcome driven by yield maximisation rather than site responsiveness**, and is therefore inconsistent with the intent of the planning framework as applied to this location.

2. Built Form, Height and Bulk – Acceptability of Impacts (s4.15(1)(b))

The Department’s SSD assessment framework places significant emphasis on whether impacts are:

- **acceptable in context**, and
- **capable of being mitigated**.

The proposed development is:

- a **53-dwelling scheme** on a **3,233sqm site**;
- with **9,246sqm GFA (FSR 2.86:1)**;
- comprising a **part 10-storey / part 5-storey building**;
- with elements exceeding height controls by up to **~4.8 metres**.

This represents a **step-change in built form intensity** in a locality characterised by:

- low-rise residential development;
- strong topographic expression; and
- heritage and scenic sensitivity.

Key SSD Assessment Issue:

The critical question is not whether some uplift is appropriate — it is whether **this quantum of uplift produces an acceptable outcome**.

In our submission, it does not.

- The scale and massing **cannot be meaningfully mitigated** through architectural treatment.
- The height exceedance is **visually and physically expressed**, not negligible.
- The resulting form creates a **dominant built presence** inconsistent with the slope-based urban structure of the Balmoral catchment.

3. Heritage, Scenic and Visual Impacts – Irreversible Change (s4.15(1)(b))

The Department typically gives significant weight to **irreversible impacts**, particularly in:

- heritage settings; and
- scenic / landscape-sensitive areas.

This site:

- adjoins heritage-listed properties;
- fronts a heritage-listed streetscape element; and
- sits at the edge of the **Scenic Protection Area (RL60 contour)**.

The proposal introduces:

- a building of a scale that **overwhelms the heritage context**;
- physical intervention into the **sandstone streetscape edge**; and
- a visual form that **extends beyond the established topographic grain**.

Key SSD Assessment Issue:

These impacts are **not temporary and cannot be reversed**.

Even if considered “minor” individually, the **cumulative effect is a permanent erosion of heritage setting and scenic character**.

SSD determinations consistently place weight on whether such impacts are:

“acceptable having regard to the sensitivity of the receiving environment.”

In this case, they are not.

4. Traffic, Access and Infrastructure – Network Capacity and Safety (s4.15(1)(b))

From a Departmental perspective, a critical issue is whether:

“the surrounding infrastructure network can accommodate the development without unacceptable impacts.”

The proposal introduces:

- **106 car spaces (~2 per dwelling)**;
- increased servicing, deliveries and waste movements;
- construction-phase impacts of significant scale.

The surrounding network:

- consists of **narrow, constrained local streets and lanes**;
- includes **Redan Lane**, which has acknowledged safety and geometric constraints;
- is already subject to **peak-period congestion and parking pressure**.

Key SSD Assessment Issue:

Even if technical compliance can be demonstrated in isolation, the real question is:

“Will the development result in unacceptable cumulative impacts on the local network?”

Given the constrained nature of the surrounding streets and the scale of the proposal, the answer is yes.

These impacts are:

- **distributed beyond the site frontage;**
- **not fully mitigable through conditions;** and
- directly experienced by surrounding residents, including Almora Street.

5. Excavation, Geotechnical and Stormwater Risk – Unresolved Matters

A key factor in SSD determinations is whether:

“the EIS adequately identifies and resolves material risks.”

This proposal involves:

- **deep excavation (two basement levels);**
- works within a **sandstone geological context;**
- **relocation of stormwater infrastructure;**
- construction in a **steeply sloping environment.**

Critically:

- stormwater design and hydraulic performance were **not fully resolved at exhibition;**
- detailed engineering design was still being prepared;
- excavation and groundwater impacts introduce **risk to surrounding properties.**

Key SSD Assessment Issue:

The Department typically requires that:

“key risks are clearly understood and capable of being managed prior to determination.”

In this case, there is a **degree of deferral and uncertainty** that is not appropriate for SSD approval.

These risks are:

- site-specific;
- potentially high-impact; and
- **not fully mitigated or demonstrated as acceptable.**

6. Public Benefit vs Environmental Cost (s4.15(1)(e))

The proposal relies on the delivery of:

- **11 affordable dwellings (15%);**
- **for a 15-year period.**

The Department's SSD framework requires a balancing exercise:

"Do the public benefits outweigh the environmental, social and economic costs?"

In this case:

- the public benefit is **limited in duration**;
- the environmental and built-form impacts are **permanent**;
- the scale of uplift materially exceeds what is required to achieve the benefit.

Key SSD Assessment Issue:

The proposal represents a **disproportionate trade-off**, where:

- the **planning concession is substantial**, but
- the **public benefit is modest and time-bound**.

7. EIS Adequacy and Consultation (Process Integrity)

The Department also considers whether:

- the EIS provides a **robust and transparent assessment**; and
- community engagement has been **meaningful and proportionate**.

In this case:

- consultation reach appears limited relative to project scale;
- awareness was not consistently direct;
- key issues raised by the community (height, traffic, character) remain unresolved.

More importantly:

- there are **inconsistencies in how compliance is described**;
- and **key technical matters were not fully resolved** at exhibition.

Key SSD Assessment Issue:

This raises questions about:

- the **completeness of the assessment**, and
- whether the Department can be satisfied that **all impacts are properly understood**.

8. Cumulative Impact and Precedent

SSD determinations increasingly consider **cumulative impact**, particularly in areas undergoing transition.

This proposal:

- references other developments under assessment;
- contributes to a **step-change in built form**;
- risks establishing a **new baseline that normalises further exceedances**.

Key SSD Assessment Issue:

The Department should consider:

“Whether approval would result in an undesirable precedent or cumulative outcome.”

In this case, approval would materially accelerate a **loss of established character and planning control integrity**.

9. Conclusion and Requested Determination

Having regard to:

- the statutory considerations under section 4.15;
- the environmental, social and infrastructure impacts;
- the unresolved technical risks; and
- the limited and time-bound public benefit,

we submit that the proposal:

- **does not represent an acceptable planning outcome for this site**;
- **results in impacts that are not adequately mitigated**; and
- **is not in the public interest**.

We therefore respectfully request that the Department:

1. Refuse SSD-93020230; or, alternatively

2. Require a substantially redesigned proposal that:

- materially reduces height and bulk;
- aligns with the topographic and heritage context;
- resolves stormwater, excavation and traffic impacts prior to determination; and
- delivers a proportionate and genuinely integrated public benefit.

We request to be notified of any amendments, response to submissions, or further assessment steps relating to this application.

Yours faithfully,

Moritz & Claudia von Hauenschild

Resident – 33 Almora Street

Mosman NSW 2088