

29 March 2026

To whom it may concern

### **Objection to Development Application SSD-93020230 at 40–48 Redan Street, Mosman**

I write to lodge a formal objection to the above development application based on the affordable housing claims. Due to the insufficient time available (see further explanation below) I have only been able to address this issue. Unfortunately, I have not had the time to address the other issues which warrant this proposal being rejected.

The proposal states that it will comprise 11 x 2-bedroom affordable units. There are no other dwelling types proposed for affordable housing.

After reviewing the proposal and considering the in-fill affordable housing provisions and Mosman rental market, the development will fail to deliver housing to meet the needs of very low, low and moderate income households and is incompatible with the desired future character of the area.

#### **Background**

The objective of the in-fill affordable housing provisions is to facilitate the delivery of new in-fill affordable housing to meet the needs of very low, low and moderate income households (clause 15A of the Housing SEPP (2021)).

The In-fill affordable housing Practice Note (December 2025) provides that (emphasis added):

- The full extent of the in-fill affordable housing bonuses may not be achieved on all sites, **due to site constraints and local impacts.**
- The in-fill affordable housing bonuses **should not be treated as an entitlement.**
- DAs that propose in-fill affordable housing will be **subject to merit assessment by the consent authority.**
- The in-fill affordable housing bonuses **do not override** any provision in any LEP or other EPI.

#### **No housing diversity**

There is a complete absence of housing diversity with no studio, one-bedroom or three-bedroom apartments. There is no justification provided for this lack of housing diversity. There is therefore a concern that the 2-bedroom affordable housing apartments have been provided based on the post 15 year, resale value of the apartments, rather than any genuine attempt to cater for the needs of very low, low or medium income households.

Accordingly, the bonus height and FSR under the in-fill affordable housing provisions should be rejected as the proposal does not deliver new infill affordable housing to meet the needs of smaller, lower income households, with no choice for studio or one-bedroom dwellings (also being inconsistent with provisions within the Apartment Design Guide).

### **No affordable housing**

The CHP Letter of Intent (Appendix L) states that the dwellings allocated for affordable housing “cater to the needs of essential workers in the community.” Despite its claims, the proposal includes zero affordable housing for essential workers or meet the needs of Sydney’s very low-, low- and moderate-income households.

Reviewing the most recent available rental data for 2-bedroom apartments in Mosman on the NSW Government Rent tables, the median weekly rental price for a 2-bedroom apartment is \$850 (Dec 2025 quarter). If a discount of 20% of market rent is applied this equates to a weekly rental rate of \$680 for a 2-bedroom unit.

This equates to an annual rent of \$35,360 for a 2-bedroom apartment.

The NSW Affordable Housing Ministerial Guidelines identify that the household income eligibility limits for the Sydney region 2025/2026 are:

<b>Household type</b>	<b>Very low</b>	<b>Low</b>	<b>Moderate</b>
Single (1 adult)	\$36,000	\$57,600	\$84,400
Single + 1 dependent	\$46,800	\$74,900	\$112,300
Single + 2 dependent	\$57,600	\$92,200	\$138,200
Single + 3 dependent	\$68,400	\$109,500	\$164,100
Couple (2 adults)	\$54,000	\$86,400	\$129,600
Couple + 1 dependent	\$64,800	\$103,700	\$155,500
Couple + 2 dependent	\$75,600	\$121,000	\$181,400
Couple + 3 dependent	\$86,400	\$138,300	\$207,300

Based on the figures above for median rent, and given that no more than 30% of gross income can be paid on rent:

- None of the very low-income households would be able to afford any of the proposed 2-bedroom affordable housing apartments.
- Two of the low-income households (Couple + 2 dependent and Couple + 3 dependent) would be able to afford a proposed 2-bedroom affordable housing apartment although it would require room sharing in all of those cases.

- Six of the moderate-income households (Single + 2 dependent, Single + 3 dependent, Couple (2 adults), Couple + 1 dependent, Couple + 2 dependent and Couple + 3 dependent) would be able to afford a proposed 2-bedroom affordable housing apartment although it would require room sharing in 4 of those cases.

Accordingly, only a moderate-income household consisting of a Couple (2 adults) or a Couple + 1 dependent could reside in a 2-bedroom affordable unit in Mosman. This equates to only two of the 24 household types identified in the Guidelines.

### **Design requirements**

The in-fill affordable housing provisions provide that development consent must not be granted to a development unless the consent authority has considered whether the design of the residential development is compatible with the desirable elements of the character of the local area or, for precincts undergoing transition, the desired future character of the precinct (clause 20 of the Housing SEPP (2021)).

The proposed apartment building has not been designed to integrate successfully in context of its surrounds or to minimise environmental impacts, particularly due to its excessive height, bulk and scale, insufficient setbacks, incompatibility with local character and streetscape, and loss of amenity including overshadowing, privacy and view loss.

### **Affordable housing provider**

Development consent must not be granted to development unless the consent authority is satisfied that for a period of at least 15 years the affordable housing component will be managed by a registered community housing provider (clause 21(1) of the Housing SEPP). The registered community housing provider (Evolve Housing) has only expressed an interest to “take on the management of affordable housing dwellings” without a credible and enforceable management arrangement under the Housing SEPP requirement. Also, no document has been provided that identifies a 15 year (or longer) affordable housing covenant. In summary, there is no enforceable legal mechanism (such as a covenant or VPA) provided by the proponent to guarantee delivery, duration, or management of affordable housing. Accordingly, the consent authority cannot be satisfied as required by clause 21 of the Housing SEPP.

### **Insufficient time**

Due to the limited time available, I have been unable to engage appropriate advisors to review the proposal and provide informed advice. As a result, I have not had the opportunity to obtain independent guidance to properly assess the merits and legality of the application. The current process and timeframe place me at a significant disadvantage, limiting my ability to respond effectively. In these circumstances, the principles of natural justice are not adequately upheld.

**Conclusion**

For all the reasons outlined above, the proposed development will fail to deliver new in-fill affordable housing to meet the needs of very low, low and moderate income households and is incompatible with the desired future character of the area. As a result, reliance on the Housing SEPP bonus height and FSR provisions is fatally flawed.

I respectfully request that the consent authority refuse the application in its current form.

Thank you for considering this submission.

Yours sincerely

D Mentzines