

29 March 2026

To whom it may concern

**State Significant Development: Application Number SSD-93020230
Residential Development with In-fill Affordable Housing - 40-48 Redan Street
Mosman**

I am writing to object to this development.

Summary of Key Objections

1. Community Character & Overdevelopment

The proposed development is out of character with the established built form and streetscape of the surrounding area. Its excessive bulk, height, and massing bear no reasonable relationship to the surrounding area and would present as visually intrusive and overbearing when viewed from the street and adjoining properties. Rather than integrating with the existing urban context, the building would dominate its setting, eroding the established neighbourhood character and sense of scale that defines the area. Approval of a development of this magnitude would set a dangerous precedent, signalling that oversized and visually dominant built forms are acceptable in locations where they are plainly inconsistent with the surrounding character, thereby undermining the integrity of local planning controls and expectations for future development.

2. Claim for In-fill Affordable Housing bonuses fundamentally flawed

The NSW Government's In-fill Affordable Housing Practice Note expressly provides that the in-fill affordable housing bonus provisions are not an entitlement. Relevantly, the Practice Note states:

"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. Development applications that propose in-fill affordable housing will be subject to merit assessment by the consent authority. The application of the bonuses does not affect a consent authority's responsibility to consider the requirements of relevant environmental planning instruments, a development's likely impacts, or the suitability of the site for the development."

The Practice Note further emphasises that, in applying the in-fill affordable housing provisions, both applicants and consent authorities are required to adopt a flexible design response, having regard to:

- the Government's policy intent to deliver additional affordable housing through the Housing SEPP; and

- the impacts of the development on the amenity of the site and adjoining land, including impacts arising from building height, scale and bulk.

Critically, the Practice Note also makes clear that the in-fill affordable housing bonuses do not override any provision of a Local Environmental Plan or other environmental planning instrument.

Against that statutory and policy framework, the proposed development is fundamentally flawed.

The proposed affordable housing offering of eleven two-bedroom dwellings has not been designed to provide a genuine mix of dwelling types and reflects an exclusive, rather than inclusive, housing outcome. The proposal entirely excludes studio and one-bedroom dwellings, thereby failing to cater for singles, couples and smaller households who are a core cohort of affordable housing need.

The proposed height uplift is not sought to facilitate affordable housing delivery, but to enable a luxury, market-focused dwelling mix dominated by larger apartments and maximised commercial returns. Once the mandatory 15-year affordability period expires, these dwellings can be on-sold as premium properties, which appears to be the clear and overriding objective.

In these circumstances, reliance on the infill affordable housing bonus provisions is misplaced. The proposal represents an attempt to leverage those bonuses to justify an otherwise unacceptable built form, rather than a good-faith response to the Housing SEPP's intent to deliver affordable housing in a manner compatible with site constraints and local amenity.

For these reasons, the claimed entitlement to infill affordable housing bonuses should be refused.

3. Heritage assessment is inadequate

The Heritage Impact Statement materially underplays the impact of the proposal on the surrounding heritage streetscape by focusing narrowly on individual heritage items rather than the cumulative effect on their setting, scale relationships and visual coherence. While the report repeatedly asserts that stepped massing, podiums and setbacks will “retain visual prominence” of nearby heritage items, it does not adequately address how a multi-storey building of up to 28.6 metres will fundamentally alter the established low-rise, fine-grain character of Redan Street, particularly the relationship between the Divided Road, the elevated pedestrian realm, and the Federation-era dwellings that derive significance from their prominence above the street.

The reliance on future character change under the LMR policy, and the characterisation of impacts as “minor” or “localised”, avoids a proper assessment of the dominance, enclosure and visual competition created by the proposed scale when viewed from

Redan Street, Balmoral Avenue and the divided road itself. In doing so, the HIS understates the extent to which the proposal would erode the historic streetscape hierarchy and diminish the heritage setting that gives meaning to the listed items in the vicinity.

4. Inappropriateness of the State Significant Development Pathway

The State Significant Development pathway is not an appropriate approval mechanism for large residential apartment developments within established local communities. Residential apartment buildings primarily generate localised impacts, such as changes to neighbourhood character, bulk and scale, overshadowing, traffic, parking, infrastructure demand and residential amenity—which are best assessed by local councils with detailed knowledge of local conditions and community expectations. The SSD pathway centralises decision-making, limits meaningful community participation, and reduces local councils to the role of submitters rather than consent authorities, undermining democratic accountability and transparency. Using SSD for residential apartment development risks incentivising oversized projects designed to meet financial thresholds rather than respond appropriately to local context. Such development should be assessed through the local development application process, where elected councils are empowered to balance housing delivery with the protection of neighbourhood character, amenity and long-term community outcomes.

5. Inadequate time

The SSD exhibition period provides insufficient opportunity for the community to meaningfully engage with the proposal. This application consists of more than 40 documents, many of which contain highly technical and specialist material. A 14-day exhibition period is inadequate and materially prejudices the community's capacity to assess the proposal and provide comprehensive feedback. A two-week public consultation period is manifestly unreasonable.

As a result of the inadequate time provided to review the documentation, there are other issues that I have not been able to adequately consider or comment on.

Yours sincerely
J Brosnan