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Dear Ms Ross

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

**1 Summary**

1.1 I refer to State Significant Development Application SSD-93020230, which seeks consent for the “[d]emolition of existing dwellings; [c]onstruction of a 10-storey residential flat building comprising 53 apartments (including 11 in-fill affordable housing apartments), two basement levels with parking for 106 cars, communal open space; and [a]ssociated works including site preparation, excavation, earthworks, landscaping and installation of services” at 40–48 Redan Street, Mosman (**Site**) (**Development Application**).

1.2 I object to the Development Application on the grounds developed in this submission. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

1.3 While I am not one of the immediately affected owners who will suffer the worst direct impacts, I care deeply about what happens to Mosman and I am concerned by what this proposal would do to the character, visual setting and practical amenity of the locality.

1.4 In my view, the Development Application is simply too much for the Site. It is too tall, too bulky, too visually dominant, and too intensive for a sensitive part of Mosman that sits within the wider harbour landscape. It is being advanced under the banner of affordable housing, but that label should not be allowed to obscure the reality of what is proposed. What is before the Department is a

very large apartment development in a low-rise residential street, with major excavation and a built form that would permanently alter the feel of this part of the suburb.

1.5 My objection is based on broader planning and public-interest grounds. In summary, I object because the proposal:

- (a) is out of scale with its surroundings;
- (b) is inconsistent with the scenic protection role of this part of Mosman;
- (c) would damage the heritage setting and neighbourhood character of Redan Street and its surrounds;
- (d) would cause very serious visual impacts, including on nearby residents;
- (e) requires an excessive degree of excavation, basement construction and traffic generation for a constrained site; and
- (f) offers a limited and time-bound public benefit that does not justify the magnitude of the planning harm

1.6 This is of course not an objection to affordable housing as a matter of principle. My enduring position is that Mosman should help build some of the affordable homes Sydney needs, but also that the present policy settings are producing the wrong kinds of outcomes in the suburb. That is also my concern here. The issue is whether this particular development is an acceptable planning outcome in this particular place. In my respectful submission, it is not.

## **2 Height, bulk, scale and site suitability**

2.1 The most immediate problem with this proposal is its scale. Redan Street and the surrounding streets are still characterised by lower-scale residential development, landscaped setbacks and a finer-grain streetscape. Even the proponent's own material accepts that the visual context east of Redan Street is predominantly low-density in character, and that the majority of surrounding

dwellings are significantly lower than the proposed building.<sup>1</sup> That is why the jump to a 10-storey building feels so extreme. It is not a small adjustment to the area but a major escalation in height, bulk and intensity.

2.2 The topography makes that worse because this part of Mosman falls away towards Balmoral and the harbour. It is a visually sensitive slope, not a dense urban corridor already defined by tall buildings. A building of this size would not quietly settle into the landscape but would in fact stand up across it. The proponent's own visual material admits that the proposal would bring about "significant visual change in terms of height and scale".<sup>2</sup> That is a very important concession and one that the Department should take seriously.

2.3 I am also troubled by the repeated reliance on phrases such as "future potential visual context" and "desired future character". [REDACTED], those expressions make it sound as though the proposal should be judged not against the place as it is, but against an imagined future in which similar developments have already been allowed to spread. That is not a fair or logical way to assess this application. The fact that an area may be vulnerable to future overdevelopment does not justify allowing overdevelopment now.

2.4 The broader point here is that once a building of this size is approved in a location like this, it inevitably becomes part of the argument for the next one. That is how a suburb changes by ratchet rather than by proper planning. Each proposal is said to fit the "future character" created by the last. That is precisely why restraint matters now.

### **3 Scenic protection and the broader harbour setting**

3.1 This proposal cannot be looked at as though it concerns only one block on one street. The Site sits in a part of Mosman that forms part of the wider Sydney Harbour landscape, falling within the Mosman Scenic Protection Area. The point of that planning framework is to protect the natural and visual environment of Mosman and Sydney Harbour, preserve the existing

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<sup>1</sup> Urbis, *40-48 Redan Street Mosman: Visual Impact Assessment (VIA)* at p. 13.

<sup>2</sup> VIA at pp. 5, 59.

landscape and landform, and maintain the dominance of landscape over built form. Those aspirations exist because this part of Mosman matters visually not just to those who live here, but as part of the harbour setting more broadly.

- 3.2 In that context, I do not accept the attempt to minimise the proposal's scenic impact by saying that the most important scenic compositions lie elsewhere.<sup>3</sup> That misses the point. Scenic protection is not only about a handful of postcard views. It is about the cumulative visual quality of the foreshore slopes, the ridgelines, the vegetation, the setbacks, and the way built form sits within the landscape. If each site is treated as expendable because it is not itself the single most iconic viewpoint, then the Scenic Protection Area is steadily eroded one proposal at a time.
- 3.3 The real question is this. Does this development preserve the existing balance between landscape and built form in this part of Mosman, or does it push it too far towards a harder, larger and more dominant built outcome? In my view, it plainly does the latter. A 10-storey building with two basement levels and major excavation is not a subtle intervention in a harbour-side scenic setting.
- 3.4 I am also concerned by the suggestion that State housing policy somehow weakens the importance of scenic protection here. It may be true that State policy encourages more housing in some areas. But that does not mean the scenic and environmental values of Mosman no longer matter. It does not mean that anything can be justified so long as it is packaged as housing supply. Good planning requires both to be taken seriously and in my submission this proposal does not strike that balance.

#### **4 Heritage, streetscape and neighbourhood character**

- 4.1 Redan Street and its surrounds have an established and recognisable character. That character comes from more than just individual buildings but also from the slope of the land, the landscaped setbacks, the rhythm of detached and semi-detached dwellings, the sandstone and retaining walls, and the relationship between homes, gardens and street. It is a part of Mosman that still reads as residential, established and fine-grained.

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<sup>3</sup> VIA at p. 40.

- 4.2 The proposal would alter that character in a very fundamental way. This is because a development of this size does not merely occupy its own footprint but would change the way the whole street is experienced. It changes the scale hierarchy and what is dominant and what is recessive. It changes the background against which heritage items and older homes are read.
- 4.3 The proponent accepts that the site lies in the vicinity of several listed heritage items, including the Redan Street Divided Road and nearby Federation dwellings. It also describes those heritage elements in ways that make clear their significance is bound up with setting, prominence and streetscape contribution, not just with the survival of bricks and timber.<sup>4</sup> That is why I do not find it persuasive to say that heritage concerns are answered by articulation, setbacks or a “highly modelled built form”. The problem is more basic than that. The building is simply too large for the context into which it is being inserted.
- 4.4 The same is true of the Redan Street Divided Road. Its significance does not depend only on whether some physical sandstone remains. Its importance lies in the combined effect of road, retaining wall, topography, vegetation and built form. A very large apartment building behind that setting would inevitably alter the way it is experienced. That is a real heritage and streetscape impact, even if some fabric survives.
- 4.5 I do not suggest Mosman should never change. Of course it will. But there is a profound difference between change that grows from the place and change that overwhelms it. I believe that this proposal falls into the second category.

## **5 Views, visual impact and amenity**

- 5.1 Although I am not one of the most significantly affected owners advancing a specific view loss case, the scale of the proposal means that it will be unavoidably visible from parts of my home [REDACTED] including from my upper level kitchen and dining room. But even beyond this direct impact, the visual consequences of this proposal remain a matter of grave concern. The proponent’s own material accepts that close immediate streetscape views

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<sup>4</sup> Urbis, *40-48 Redan Street Mosman: Heritage Impact Statement (HIS)* at p. 52-3.

are among the most affected and that some nearby dwellings may suffer impacts ranging from severe to devastating.<sup>5</sup> That is a remarkable concession and not one that should be brushed aside.

5.2 It tells us something important about the proposal, being that the design has not truly resolved the consequences of putting a building of this size on this site. If the proponent's own assessment is that some neighbours may experience devastating impacts, the answer cannot simply be to say that only a small number of homes are affected, or that future residents of the new building will gain views of their own. That is not a satisfactory planning response.

5.3 I am also troubled by the way the proponent tries to soften those impacts. There is a repeated suggestion that only "open sky" is being lost, or that mass has been skilfully redistributed, or that future residents will share in views presently enjoyed by others. That language may sound neat in a consultant's report, but it does not confront the reality of what is happening. In a suburb like Mosman, openness, relief, ridgeline character and outlook matter deeply. They are part of what gives these streets their quality. They cannot be dismissed as if they were luxuries of no planning significance.

5.4 Related issues of privacy, overshadowing and general visual burden also arise. Even without dwelling at length on the most personal consequences for those immediately affected, it is plain that a building of this size, in this position, will impose a substantial burden on surrounding residential amenity. Again, that matters. A proposal does not become acceptable simply because the worst of its effects are concentrated on a smaller number of neighbours.

## **6 Excavation, traffic, access and landscape intensity**

6.1 Another aspect of this proposal that causes me real concern is the sheer intensity of the physical intervention required to realise it. The exhibited material indicates deep excavation into sandstone, substantial basement works, tree removal and major below-ground construction. On a steeply sloping site in an established residential area, that is a very serious

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<sup>5</sup> VIA at p. 43.

undertaking. It brings with it obvious concerns about vibration, haulage, dust, drainage, retaining conditions, effects on adjoining land and the long period of disruption that major excavation inevitably entails.

- 6.2 Even if some of those matters could be addressed to a degree by conditions, the scale of the excavation still says something important about the proposal. It says that the development is asking too much of the Site. The more extreme the engineering intervention required to make a proposal work, the more legitimate it is to ask whether the proposal itself is simply too large and too intensive for the land.
- 6.3 Traffic and access raise similar concerns. A development with 106 car spaces will inevitably generate a material increase in vehicle movements, servicing and construction traffic. The surrounding streets and lanes are already constrained by width, gradient, parked cars and pedestrian use. That is part of the reality of this part of Mosman. It is not enough to speak abstractly about access. The question is whether the local network can comfortably and safely absorb this kind of intensification. I do not believe it can.
- 6.4 Earlier objection material has also raised a concrete concern about the width and practical functioning of Redan Lane, including whether two vehicles could safely pass if the proposed footpath treatment proceeds. That is exactly the sort of on-the-ground issue that glossy plans and rendered diagrams can miss or understate. It should be scrutinised carefully.
- 6.5 There is also a landscape consequence. One of the reasons this part of Mosman remains so attractive is that planting, canopy and garden setting still do a great deal of visual work. They soften the street. They break up built form. They preserve something of the natural quality of the slope. A development of this size, with a large basement footprint and dominant building mass, inevitably puts that quality under pressure. The issue is not whether some replacement planting can be arranged around the edges. It is whether the overall balance between vegetation and built form is being preserved. In my view, it is not.

## **7 Affordable housing, compliance and the public interest**

- 7.1 I want to be clear that I do not object to affordable housing as a principle. Mosman should contribute to Sydney's housing future. That is not the issue. The issue is whether affordable housing is being used here to justify a development outcome that would otherwise be regarded as far too large for the site. That is a fair and important public-interest question.
- 7.2 In my view, that is exactly what is happening. The affordable housing component is being relied on to support a very large market-led development with substantial and permanent consequences for the character of this part of Mosman. The public benefit said to justify the proposal is limited and time-bound while the physical consequences are major and lasting.
- 7.3 I am also concerned by the proposal's reliance on departures from planning controls. I do not say that every variation is necessarily improper, but where a development is already pushing hard against the site's capacity, and where height, scale and visual impact are already central problems, it is no answer to say that the controls should simply give way because the proponent has a preferred design outcome in mind. Development standards exist for a reason.
- 7.4 More broadly, there is a real risk here to planning coherence. In a high-value suburb such as Mosman, where outlook, upper-level amenity and topography carry very substantial premiums, additional height can yield very substantial private gain. That makes it even more important that density bonuses and policy pathways be used carefully and with genuine reason. Otherwise, the community is left with the permanent burden of overdevelopment while the private upside is captured elsewhere.
- 7.5 This is why the public-interest question matters so much. The Department is not only deciding one building. It is also sending a signal about what sort of change will be accepted in this part of Mosman. If this proposal is approved, it will be harder to resist the next one, and the next after that. That is how a suburb loses its shape.

## **8 Conclusion**

- 8.1 This proposal is not a modest or balanced response to the site. It is a very large and intensive development that would alter the scale, appearance and character of this part of Mosman in a profound way. It would weaken the scenic protection role of the area, diminish its heritage and streetscape qualities, impose serious visual and amenity burdens, and set a damaging precedent for further overdevelopment.
- 8.3 Mosman should accommodate change sensibly and fairly. But this is not sensible change. It is too much, in the wrong place, in the wrong form. I respectfully urge the Department to refuse SSD-93020230.

Yours faithfully

