

Edwina Ross
Senior Planning Officer
Department of Planning, Housing and Infrastructure
edwina.ross@dpie.nsw.gov.au

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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**)n has always had a
- 1.2 I object to this application because, in my view, it represents an excessive and unsuitable form of development for the Site and its setting. The proposal is not a modest or localised intervention but a substantial intensification of built form, excavation and traffic generation in a sensitive part of Mosman. As explained further below, its height, bulk, visual presence and basement excavation raise serious questions about site suitability, scenic impact, local character, heritage setting, amenity and the public interest.
- 1.3 The proposed development is complex. It is supported by hundreds of pages of submissions by consultants paid by the applicant. There is no pretence of independence in those reports. They are plainly prepared in support of the application and not to provide a balanced, fair or objective assessment for the consent authority’s consideration. The supporting materials should accordingly be afforded limited weight and the merits of the application should be the subject of independent advice from professionals retained directly by the consent authority.

2 Height, bulk, scale and suitability of the Site

- 2.1 Redan Street and its surrounding streets are characterised by lower scale residential development, landscaped setbacks, and a finer grain streetscape. Against that backdrop a 10-storey building with two basement levels and 106 car spaces is by any metric an **abrupt** escalation in height, bulk and intensity. The Development Proposal represents an overdevelopment of a constrained site rather than any type of contextual response to its surroundings. The extent of excavation and basement form reinforces that conclusion.

3 Scenic protection and broader visual setting

3.1 This part of Mosman is not comprised of isolated suburban streets but rather directly forms part of the wider harbour landscape. Development in this setting should preserve the visual qualities of the foreshore slopes, including the existing balance between vegetation and built form. In my view, the proposal would replace that balance with a much larger and more dominant built form, visible in a way that is appreciably inconsistent with the scenic values of the area.

3.2 Of particular significance is that the Site falls within the Mosman Scenic Protection Area, which the Mosman Council describes as an “integral part” of the Sydney Harbour landscape because of its visibility from surrounding waterways and land areas across the water. As the Council rightly notes, the significance of Mosman’s foreshore slopes has been recognised in both State and Council planning since the 1960s.¹ There is no justification for moving the Scenic Protection Zone for the economic convenience of a single development. That would set a dangerous precedent and an abuse of the carefully created environmental and amenity protection that has evolved over decades. The applicant has not justified any change being made.

4 Heritage, streetscape and neighbourhood character

4.1 The proposal should also be assessed by reference to the heritage setting and established character of the locality. The surrounding area includes older residential buildings, fine-grain development, landscaped setbacks and a coherent rhythm of lower scale built form. A development of this size risks overwhelming that setting and altering the character of not merely the Site but of the street as a whole.

5 Deep excavation, sandstone, basement construction and groundwater risk

5.1 A further concern is the scale of excavation required for the proposed basement structure. The material exhibited indicates deep excavation into sandstone and substantial basement works, which has implications not only for the Site but for potential effects on adjoining land. These matters go directly to the suitability of the Site and the adequacy of the assessment.

6 Traffic, access and pedestrian safety

6.1 The proposal would intensify vehicle activity in a location that is already constrained. A development with 106 car spaces would necessitate substantially more vehicle movement, service activity, and construction traffic. In my view, the local street and lane network is not well suited to that level of intensification, particularly given the existing gradients, narrow streets, sight-line issues, on-street parking, pedestrian use and school or beach-related traffic in the area.

¹

7 Landscaping, canopy and the balance between vegetation and built form.

7.1 One of the defining qualities of this part of Mosman is that vegetation still plays a dominant visual role. My concern is that the proposal would shift that balance too far toward built form. Any loss of mature planting, deep soil opportunity, or visual canopy would be significant because it contributes directly to the character of the slope and the public domain in this part of Mosman.

8 Affordable housing pathway, public benefit and inclusive design

8.1 I do not oppose affordable housing as a matter of principle. However, residents are entitled to ask whether, in this case, the affordable housing component is being used to justify a much larger market apartment outcome than would otherwise be acceptable on the Site. It is an abuse of the discretion that may be available to the consent authority. That is a legitimate planning question and relevant to whether the public benefit said to arise from the affordable housing component is proportionate to the proposal's impacts, particularly where the affordable housing obligation is time limited rather than permanent.

8.2 The social housing outcome proposed by the applicant is inimical to Australian and community values, social cohesion and is inappropriate. The proposal is for "**poor doors**", so that those in the so-called affordable housing are required to use alternative and plainly inferior access to the development. The affordable housing is placed on the services lane, and access is to be via that means. In addition the affordable housing consists, to a material degree, of bedsits which are comparable in size to a standard hotel room. That is not an affordable housing solution – it is a socio-economic purgatory and an obscene abuse.

9 Conclusion

9.1 For the reasons set out above, I respectfully submit that the Development Application should be refused. The proposal represents an excessive and unsuitable response to a sensitive Mosman site. In my view the concerns identified are not peripheral but go to the heart of site suitability, local character, scenic protection, residential amenity and the public interest.

Yours Sincerely

Pamela Blackwell

0412 224 041

10/11 Hardie Street

Neutral Bay. NSW 2089