

**Submission in regards to Mixed use development at 61A - 65 Albert Avenue,
Chatswood (Mandarin Centre)**

I strongly object to the development design for 61A – 65 Albert Avenue as outlined in the EIS dated February 2026. The reasons for my objection are outlined below, but in summary I believe the design unfairly and meaningfully affects the health and wellbeing of people in the surrounding community and will likely cause significant and targeted stress to existing residents in the neighbouring building. The shape and height of the building is not compatible with good planning principles, in my view, and must be redesigned to incorporate the many legitimate objections.

The reasons for my objections are as follows:

1. Removal of Natural Light

A significant number of apartments in the neighbouring Sebel building are designed to maximise their exposure to natural light. With the current design for this development, natural light will likely in many cases (over 100 apartments) be completely obscured (see below for comparison images as modelled in the EIS) which I believe is commensurate with a dramatic loss.

Natural light is important for both physical and mental health (e.g. see <https://link.springer.com/article/10.1186/s12889-025-24618-8> and <https://www.sciencedirect.com/science/article/abs/pii/S0165032721008612?via%3Dihub> for two example academic studies). This design is likely to cause dramatic loss in natural light for the neighbouring apartment tower that (from my understanding) houses a significant number of older and movement impaired individuals. Many affected residents will likely have very limited ability to compensate for this loss in natural light with more time spent outdoors. I contend it is the developers and the NSW government's responsibility to ensure that the health and wellbeing of sensitive communities are not unduly affected by development nor cast aside in the approval process.

The NSW Apartment Design Guide acknowledges the importance of natural light to people living in apartments, and if the proposed design proceeds it would likely result in a significant number of Sebel residents losing most of their natural light exposure to levels far below the design standards proposed by the NSW government for developers. It is not only the natural light of new apartments that should be considered by the NSW government, but those in existing apartments that are affected by new developments.

2. Privacy Concerns

The south-facing Sebel building apartments were all designed to maximise the light/view exposure. Large windows are in every room and are most often floor to ceiling. It was originally designed never anticipating a future government will potentially approve the construction of a new tower mere metres away that completely blocks the south

end of the building. Accordingly, many residents of the Sebel building will now have the entirety of their units on public display for 61A-65 Albert Avenue if this proposed design proceeds. I believe there are no adequate mitigation measures that can be implemented, as personal privacy is compromised even from very limited or obscured viewing opportunities by the neighbouring building. It will completely alter the affected resident's ability to live freely in their own apartment. Compromising the personal privacy for over 100 families in the Sebel building will likely lead to significant loss to living amenity and could give rise to anxiety and depression.

3. Complete abandonment of view sharing principles

'View sharing' is a principle in development that has a long history and precedent in the design of buildings in NSW. In fact, it was a chief concern in the previous proposed design of this development. It is also the reason that view impact assessment and view sharing assessments are included in the EIS at all. I can't recall a proposed design for a new apartment building that so completely abandons this guiding principle.

Consider these figures from modelling of the view impact of two representative south-facing apartments in the Sebel building:



Figure 46 View 04 Existing View (without Gateway Approval)



Figure 47 View 04 Approved and Proposed View

Figure 1: View 4 assessment, Appendix M of the EIS



Figure 53 View 05 Existing View (without Gateway Approval)



Figure 54 View 05 Approved and Proposed View

Figure 2: View 5 assessment, Appendix M of the EIS

As can be seen, the proposed design blocks 100% or close to 100% of all view and the associated natural light and privacy that is associated with the existing view. These are not special cases, but are broadly representative for the south-facing Sebel apartments, of which there are over 100.

4. Incorrect statements in the EIS

The NSW government is only ever able to properly assess the impacts of a proposed development when the applicant and their various subcontractors provide accurate information in the EIS process. In the above-mentioned view assessment, the EIS rates the view impact as 'moderate'. If this impacted view shown in Figures 1 and 2 of this submission is 'moderate', what could possibly constitute a 'high' impact? I believe the EIS language downplays the impacts of what the proposed design causes.

For instance, the EIS states:

- "The view sharing outcome and visual impacts of the proposal are supportable." (p.47 of Appendix M)
How can it be called view sharing, let alone supportable view sharing, when it does not share literally any of the view with an existing development?
- "The views lost include a section of the Sydney CBD built form typology which considered as a whole to be a recognisable visual feature. This features as a single entity including icons which at this distance are difficult to perceive or identify as unique or iconic." (p.47 of Appendix M)
This is not true as the view clearly includes the Sydney Harbour Bridge, and is not difficult to perceive as you can even see the colour and design of the flags that are above the bridge without any magnification. This is apparent when perceiving the view in person.
- "The composition of views to be lost are predominantly vernacular characterised by residential development, open space and distant views towards Sydney development, vegetation and open sky."
This is not true as the view includes ocean, coastline features such as rock formations and ridgeline, and the waterline in at least some of the affected apartments. I am not sure why the images taken by the company were framed so that one could not see water in the existing view. Nevertheless, the impact assessment as it stands is incomplete.
- "The majority of the currently available views are already subject to widespread loss subsequent to the Gateway Approval so that only a limited number of centrally located dwellings are significantly affected by this proposal."
This is not true as their own report shows that there are many apartments, not a highly limited number, that go from minimal or moderate view impact to

complete view blocked. Moreover, the effect that visual impacts have on wellbeing and amenity of existing residents is nonlinear. Having a view 50% obscured is many times preferable to having it 100% obscured.

If the EIS is incorrect in this aspect, it could easily be unreliable in other parts of the report as well.

5. Shadowing of Chatswood Oval

Chatswood Oval is irreplaceable. It is the only significant public green space in the rapidly growing central district of Chatswood. It and its neighbouring playground and skate park is used extensively by a diverse range of family groups for many different purposes. The proposed development is likely to introduce additional overshadowing at key times, which will impede vegetation growth and again reduce access to natural light in the local community which is a significant impact. The overshadowing analysis in the EIS is I believe limited in scope and does not adequately consider the surrounding vegetation and public space which is critical for the oval's amenity.

6. Wind tunnelling

Wind tunnelling assessment is completely absent from the EIS from what I can see. The minimal distance between the Sebel and the proposed design is sufficiently small and all-encompassing (as in, the buildings have minimal separation over a very large space) it is likely to cause significant wind tunnelling. The doors and windows of the Sebel building were not designed to withstand the wind noise and force that could be created by the wind tunnel, potentially leading to harmful noise pollution for neighbouring residents and significant costs. But it may also impact pedestrians, residents in other buildings, and vehicles.

For the above reasons, I implore the applicant and NSW government to redesign this proposed development. I am not against redevelopment of the Mandarin Centre address. In fact, I would be largely supportive of a design similar to the previous proposal that was made for this address. If that previous design could be modified in ways that address the concerns the government had with it, without introducing severe and targeted impacts on the Sebel building that this design does, then that would be far preferable. The currently proposed design doubtfully addresses the overshadowing concerns of the previous design, and causes over 100 apartments in the neighbouring Sebel building to receive severe potential impact across many metrics: natural light, wind exposure, and loss of privacy.

I believe that approving this design as it stands is fundamentally incompatible with the obligations of the NSW government as outlined in the Core Ethical Framework Principles in the GSE Act 2013 which are:

- ***Integrity:*** *Placing public interest over personal interest, acting honestly, and providing impartial advice.*

In this case, my view is that the current design favours profit maximisation over the public interest of the surrounding community.

- ***Trust:*** *Building relationships based on mutual respect, upholding democratic principles, and engaging in collaborative, apolitical work.*

In this case, approving a particular design over the objections of a significant number of the local community and council is not consistent with democratic principles or mutual respect.

- ***Service:*** *Providing services fairly, with a focus on customer needs, and maintaining high standards of quality and innovation.*

In this case, those that would be unduly affected by the current design is trusting the government to act in a way consistent with fair service and a focus on customer needs.

- ***Accountability:*** *Taking responsibility for decisions, promoting on merit, and being transparent with public resources.*

In this case, those that would be affected by the current design are relying on the planning consultation period to consider their future health and wellbeing, and place a strong weight on these concerns when considering a potential design.

Setting concerns aside, or approving plans over strong and valid objections, only decreases trust in government and alienation from civic life by those affected.

Please, do not approve this design just for the sake of expediency. For those reading this, would you design or approve a building like this if you were the one that lived next door? Increasing the number of inhabitable dwellings in Sydney is important, as is redeveloping the Mandarin Centre site, but must be done in a way that does not unduly impacting existing residents. I believe this is both possible to do and highly feasible, and that the previous design came close to achieving a correct balance.

Thankyou very much for your time and consideration,

Timothy Neal