

Residential development with in-fill affordable housing – 11-23 Rangers Avenue Mosman

Summary of Findings

The proposed residential development of 11-23 Rangers Ave Mosman should be declined

- a) The proposal exceeds the height limitations under the LMR and fails to meet the requirements as outlined in the SSD SEAR's Industry Specific Cover Letter by:
 - i. Walking distance is greater than 800 metres if you use the only safe street crossings at Military Rd and Spofforth St or Spofforth St south of Rangers Ave.
 - ii. The proposal has not demonstrated that properties 9 and 9A Rangers Ave will not be isolated.
 - iii. Has not demonstrated it meets the requirements of MLEP 2012 in relation to view sharing, bulk and scale and desired future character of the area.
 - iv. Has not provided a detailed view loss and view sharing assessment having regard to principles established in Tenacity Consulting v Warringah Council.
 - v. Has not shown COS can receive 2 hours of sunlight as the impact of proposed tree plantings has not been considered.
- b) If this is in fact a State Significant Development (SSD), I would expect expert assessments that form part of the submission to be independent and of a quality worthy of a State Significant Development. How can the Minister exercise their Authority when the proposal comprises poor quality analysis of the various impacts and is presented with factual & grammatical errors, biased commentary, clear omissions of required analysis, and a false belief that compliance with the bulk and height limits of the LMR Policy overrides all other considerations. Errors include:
 - i. Incorrectly referencing 12-38 Rangers Ave in the assessment of view loss.
 - ii. Referencing in the EIS Woollahra LGA target dwellings is irrelevant with no reference to Mosman LGA target.
 - iii. No reference to Holt Ave houses except nos 20 and 22 in the assessment of view loss.
 - iv. Incorrect assumption used in trip estimate that understates the traffic impact with the correct calculation 4 times larger.
 - v. Incorrectly states a pram crossing at Spencer St and Spofforth St.
 - vi. Incorrectly assumes Rangers Ave is appropriate for construction vehicles as Rangers has a 3 Tonne limit
 - vii. Incorrectly asserts that MLEP 2012 and LEC view sharing and view loss principles do not apply if development meets LMR Policy
 - viii. Incorrect site location star on map on page 5 of Traffic Impact Assessment.
 - ix. Deceptively calling the views as "distant" or the visual impact from Old Cremorne Wharf as "visible intermittently" yet using the views on the front cover of the Design Report No 1 to sell the project.
- c) The proposal is based on flawed assertions by the Developer that:
 - i. the intent of the LMR Policy is to replace the view loss and view sharing principles of Tenacity Consulting v Warringah Council and

- ii. that any impact study should assess the development against the future character of Mosman as is (in their opinion) dictated by the LMR Policy.

Nowhere has the future character anticipated by the LMR Policy been defined.

- d) The proposal frequently references the change in character that is anticipated by the LMR Policy and suggests that this development is a model for the future. Yet in other areas of the impact studies, the Developer assumes these other developments do not occur. The cumulative effect of multiple developments and proposed amalgamations on character, amenity, view loss, heritage impact and local character is significant.
- e) The proposed development will significantly impact the surrounding areas through the bulk (85 metre frontage) and height (25.7M) of the development impacting on the Holt Estate Heritage zone, and the Scenic Protection Zone. The loss of views and the intrusion of the dominating towers in their place is significant and the impact on local character will result in permanent scarring. The location is in a street prone to local traffic choke points. There is no ability for construction of the site to be undertaken given the tonnage limit on Rangers Ave and lack of parking / access on Rangers Ave and the unsuitability for any access from Bloxsome Lane or Holt Ave for construction or worker parking.
- f) It is procedurally unfair to expect residents to respond to 45 documents provided on Dec 4 and have a detailed response by Dec 17. It was clearly accelerated by the Developer in a reaction to Mosman Council's agreement with the NSW State Government. This also follows a similar agreement between Ku-ring-gai Council and the NSW State Government for the Council to develop a revised planning map that still meets the targets for increased dwellings. The timing was also designed in the hope that the pre-Christmas period would make it difficult for objections to be formulated. The proposal is deliberately verbose with many segments repeated numerous times within a document and across multiple documents.
- g) The Developer is hiding behind the "affordable housing" smokescreen when the only driver for the project is developer profit based on the prime views over the harbour, city skyline and Harbour Bridge. Excluding 10 affordable living residences, the apartments in the proposed towers will be priced at many multiple millions of dollars. The additional dwellings required by the NSW State Government under the LMR Policy are easily achievable without the permanent scarring of the Sydney Harbour foreshores and scenic protection zones, and without changing the local character or increasing significantly traffic congestion and pedestrian safety. All of these are certain to occur under this proposal.

Residential Development at 11-23 Rangers Avenue, Mosman





Developers image of the development that highlights the impact on the neighbouring houses in Holt Ave to the rear of the development.



Impact of Development as seen from Sydney Harbour / Old Cremorne Wharf

EIS Response to Executive Summary

The Site

Existing developments 1,2,3 & 4 storey – The sloping block means that none of the existing properties are above 2 storeys when viewed from Bloxsome Lane. No reference is made to the views of houses on Holt Ave that are 2 storeys.

Easy walking distance is dependent on the age of the person. The area is hilly and an elderly person would find the walk to Spofforth Rd and Cremorne Town Centre difficult. The Developer has assumed the walking distance is judged by crossing Spofforth St at Holt Ave. The picture below shows the crossing of Spofforth St at Holt Ave as used in the calculation of the 800M walking distance. It is a busy intersection without any indication to drivers of pedestrians crossing and cars turning left from Holt Ave are often looking to the right for on-coming cars rather than pedestrians on their left. There is also no island protection in the centre of Spofforth St, so pedestrians need to cross the full width of Spofforth St in one go. Spofforth also has the regular bus services in both directions past this point.



If the distance is judged to the only safe pedestrian crossing of Spofforth St (at Military Rd), the distance exceeds 800 metres. Even if Bloxsome Lane (totally unsuitable for constant pedestrian traffic) is used, it is more than 800 metres.

Military Rd is described as a key transport corridor but no mention of its current lack of capacity to deal with existing traffic.

Current schools (primary and secondary) do not have capacity to take an increase in population as expected under this and other amalgamations in process.

Project Objectives

The built form of the proposed development can not be described as referencing the heritage and surrounding character. The bulk of the development is massively outsized and dominates the surrounding area.

There is no respect for heritage conservation as the 6/7 storey development will overlook and dominate the houses behind in Holt Ave. The trees will not cover the height of the development that is less than 9 metres from the boundaries of the Holt Ave house.

This development will not improve accessibility for residents. The significant increase in population in a small pocket will overwhelm the nearest bus stop on Avenue Rd. Local services will be strained under the additional traffic and parking of this and other amalgamations.

Community and Stakeholder Engagement

I contacted Urbis on Nov 17th regarding the development. A response asked for me to list my issues. This was completed and an initial date set for Dec 3rd to participate in a meeting (zoom). This was scheduled on Nov 28th. This was cancelled by Urbis on Dec 2nd and rescheduled to Dec 10th. On Dec 4th, the exhibition period commenced and the stakeholder feedback seems to have been concluded without the meeting that was promised. When the consultation did happen on Dec 10th, residents had no opportunity to speak. Questions were delivered in written form, and the Urbis representative chose which questions were to be directed to the developer representatives. There was clearly no intent to act on any feedback from these sessions.

Strategic Justification

“Section 6 has been demonstrated that for each of the likely impacts identified in the assessment of the key issues, the impact will either be positive or can be appropriately mitigated”

This claim is at best completely uninformed and at worst a blatant lie. This is not a positive development for surrounding area and the limited community benefits are far outweighed by the massive intrusion on the local infrastructure, traffic congestion and character.

This proposal does not integrate with local character. It totally changes the local character with the 6-7 storeys across an 85-metre frontage. The development can not be consistent with the NSW Better Places requirement that seeks developments that are “well-integrated; enhance public domain and local character.”

Project Background

I do not understand why the Woollahra LGA target listed is relevant for Mosman. The Mosman LGA is 500 new properties. Under the current developments and proposed amalgamations, 4 developments from 11 Rangers Avenue to 54 Ranges Avenue (a total distance of 500m) would deliver in excess of 200 new residences. Clearly meeting the State Government’s target by 2029 is not in question for the entire Mosman LGA and delivering over 200 dwellings within a 500-metre distance will substantially impact the local area and overwhelm the capacity of the local areas to service the traffic and other needs.