

SUBMISSION TO NSW DEPARTMENT OF PLANNING, HOUSING AND INFRASTRUCTURE

Re: SSD-96272465 – 11–23 Rangers Avenue, Mosman (the Development)

Introduction

My wife and I are residents and property owners, living in Park Avenue, Mosman. We write to object to the proposed State Significant Development (**SSD**) at 11–23 Rangers Avenue, Mosman. While we acknowledge the importance of housing supply, this proposal raises unacceptable impacts in relation to traffic safety and congestion, and heritage preservation. These impacts are inconsistent with the objectives of the Environmental Planning and Assessment Act 1979 (EP&A Act) and the SSD assessment framework, and **therefore warrant refusal or substantial redesign.**

A. Traffic and Vehicular Access

- ***Existing Traffic Flows:*** Rangers Avenue already functions as an alternate route for both eastbound and westbound Military Road traffic. This results in very heavy flows, particularly during peak hours. Major congestion is evident in Rangers Avenue and in Avenue Road.
- ***Unsatisfactory Access Point:*** The proposed vehicular access to and from the Development is via Rangers Avenue. In this regard, it is proposed vehicles accessing and exiting the Development will be via two single lanes (vis one for exit and one for access). Whilst this arrangement may work for vehicles exiting the Development, for those vehicles seeking to enter the Development during the AM and PM Peak periods, **substantial congestion** will arise owing to entry and exit traffic obstructing normal traffic flows. This issue recognises two factors, namely:
 1. During the AM & PM Peak periods (**the Peak Periods**) , the respective East and West bound traffic flows on Rangers Avenue are “heavy” with a continuous flow of vehicles. This fact recognises that Rangers Avenue forms part of an important ‘back-route’ alternative to using Military Road. This route is subject to very heavy traffic usage, particularly during Peak periods, and
 2. Further to 1, during such periods, congestion at the roundabouts located at Park Avenue/Rangers Avenue (No.1) and Avenue Road/Clanrobert Street

(No.2) is highly congested. This outcome often gives rise to Avenue Road and Rangers Avenue traffic being stopped.

- JMT Consulting Transport Impact Assessment (the Report): This report makes numerous observations, the veracity of certain, we challenge. Specifically, these observations are detailed below and use the paragraph references applied in the Report:
 1. Access to Bus Services - At section 2.2 of the Report, it is stated that access to B-Line double decker bus services(provided on Military Road), could be accessed within a “... 10 minute walk of the site ...”. In our opinion, this estimate is not realistic. In reality, walking from the Development to Military Road bus arrival and pickup/dispatch points is much greater than 10 minutes. In fact, the average relevant walking distance is greater than two (2) kilometres. Based on such a distance, and walking at an average of five (5) kilometres per hour, a walking time of 24 minutes is calculated (and not 10 minutes as suggested in the Report).
 2. Existing Traffic Volumes – The Report at 2.4.1 details various traffic counts along Ranges Avenue and at the key intersection of Rangers Avenue and Park Avenue (**the Park Avenue Intersection**). Based on this data, various observations have been reached, many of which we challenge. In this regard, we note:
 - a. Firstly, Figure 4 of the Report has been incorrectly drawn, thus giving a possible false impression as to efficacy of the Park Avenue Intersection. In reality, the proposed Access Driveway of the Development will not be adjacent to Park Avenue. In fact, such driveway will be located approximately 50 metres west of the current Rangers Avenue/Park Avenue intersection;
 - b. Secondly, for traffic exiting the Development during the Peak Periods only two (2) exiting vehicles over the two (2) hour period, are indicated. The same number are estimated to enter the Development also over the Peak Periods. In our opinion, these numbers are not realistic given the Development property would be expected to have a total resident population of at least 97 persons, and who own at least 70 motor vehicles. The basis for these calculations are set out in the table that follows.

Unit Type	No. of Units	Est. Resident per Unit	Est. Resident No.	Min. Parking Rate per Unit	Min. No. of Parked Vehicles
<i>Non-Affordable Housing -</i>					
2 Bed	6	2.0	12	1.50	9
3/4 Bed	28	2.5	70	2.00	56
<i>Affordable Housing -</i>					
2 Bed	10	1.5	15	0.50	5
Visitors	44	NA	NA	0.25	11
Totals	44	NA	97	NA	81

- c. Based on the above table, an apparent assumed resident parked-car population of 70 is calculated. Given this number, it is highly likely that the estimates of vehicles entering and exiting the Development over the collective Peak Periods (namely four (4) vehicles only), is a gross understatement, and is flawed.
- d. This conclusion is validated at 3.9 of the Report. Here, the 2024 Transport for NSW Guide to Transport Impact Assessment (GTIA) document is referenced. Based on the criteria set out at 3.9, incremental AM Peak Hour traffic load is increased by 12.36 vehicles. Whereas, for the PM Peak Hour, an increase of 9.60 vehicles is calculated.
- e. Thirdly, whilst the Park Avenue Intersection will not be adjacent to the Development, it has been concluded that this intersection has Peak Hour grades of “A” for Level of Service. Further, it has been estimated that an Average Delay of only 4 seconds (see Table 3 of The Report). These determinations have been based on data apparently collected during the Peak Periods in September 2025. Notably, the specific data period associated with such recorded data has not been provided, thus giving rise to questions as to the data’s reliability. For example, was the data collected over one day or multiple days. If so, how many days, and was such data averaged?
- f. Based on these considerations, the Level of Service grading and the Average Delay calculation, must both be questioned.

g. Fourthly, at 1.5 of the Report, JMT Consulting concludes as follows:

“ The proposal ... is not expected to impact the operation of the local road network and is therefore not considered to be ‘traffic generating development’ as defined under Schedule 3 of the TI SEPP.”

Contrary to this view, we strongly believe this development will place substantially increased traffic volumes on the already overloaded Rangers Avenue and its roundabout at the Park Avenue intersection.

- Safety Concerns: Unquestionably, introducing additional vehicle movements from a 44-apartment complex will exacerbate congestion on both Rangers Avenue and Park Avenue. As a result, increased risks for pedestrians will arise, and compromise local amenity.
- Legislative Reference: Section 4.15(1)(b) of the EP&A Act requires consideration “the likely impacts of the development, including environmental impacts on both the natural and built environments, and the social and economic impacts in the locality.” The traffic impacts here are demonstrably adverse as earlier outlined.
- SSD Guideline Reference: SSD projects must demonstrate safe and efficient access arrangements. This proposal fails to meet that requirement during Peak Periods as:
 1. vehicles exiting the Development and seeking to travel in a westerly direction, will be forced intrude across east-bound travelling at an estimated frequency of one (1) vehicle every 7.75 seconds. This value is calculated using an average vehicle number of 465 across each of the one (1) hour Peak Periods; and
 2. whereas, for vehicles entering the Development from a west-bound lane, they will also need to cut across east-bound traffic. This traffic would have an expected frequency similar to that stated at 1. above (i.e. one (1) vehicle every 7.75 seconds).

B. Heritage Loss

- Federation-Style Houses: A search of academic records covering the existence and importance of Sydney’s Federation architecture, will show that Mosman is

the dominate and leading example of this genre. So much so, Mosman displays numerous examples of Federation design, including the Queen Anne and Federation Arts & Crafts styles. Commonly, Federation houses will present such features steep gables, terracotta tile roofs, wide verandahs, bay and leadlight windows.

- Of the seven (7) existing properties making up the Development site, four (4) are of Federation style, each of which exhibit high heritage values. Collectively, they contribute to Mosman’s distinctive heritage streetscape. Two of the properties, namely 21 & 23 Rangers Avenue are notable examples of the Federation/Victorian style. Discussion covering these properties follows below. Accordingly, we contend that each of these properties must be preserved.
- 23 Rangers Avenue - This circa 1912, four (4) bedroom bungalow displays classic Federation elements. These include high ceilings, decorative cornices and centre-pane leadlight windows. As its allotment size is 735 square metres, it represents 20.45% of the Development’s land content.



23 Ranges Avenue, Mosman NSW 2088

- 21 Rangers Avenue – This grand family residence was constructed in 1890. Whilst exhibiting some elements of the Gothic Revival style, it prominently displays Victorian features, including a steeply pitched roof, bay windows and dual verandas. These are decorated with ornate timber fretwork and wrought iron balustrades. The property currently has 4 bedrooms, 3 bathrooms, and 2 (or

3) parking / car spaces. It is located on a 678 square metre allotment and represents 18.86% of the Development's land content.



21 Rangers Avenue, Mosman NSW 2088

- 15 & 17 Rangers Avenue – These two properties each display elements of federation architecture. The properties are small as evidenced in No.15 having only two (2) bedrooms and an allotment size of 256 square metres. Notwithstanding its limited size, it has what appears to be a unique, highly decorated ceiling and associated cornices. As for No. 17, it is a two (2) level property, thus affording three (3) bedrooms. Albeit, the house is constructed on a small allotment (i.e. 289 square metres). Despite their smallness, both of these properties display key elements of the Federation style.
- Preservation: Collectively, the aforementioned four properties represent 54.5% of the Development's total land content. Given their high heritage values, it is our opinion that they must be preserved. In which case, the Development is rejected

in its entirety. Alternatively, the four Federation properties are removed from the Development.

- *Irreversible Impact*: We contend that demolition of these homes would permanently erase a significant part of Mosman’s architectural character.
- *Community Identity*: The preservation of Federation housing stock is integral to Mosman’s cultural heritage and identity.
- *Legislative Reference*: Section 4.15 (1)(a)(iv) of the EP&A Act requires consideration of “*the provisions of any development control plan.*” Mosman’s Development Control Plan emphasizes heritage conservation, which this proposal disregards.
- *SSD Guideline Reference*: The SSD framework requires assessment of heritage impacts. The wholesale demolition of Federation dwellings is inconsistent with the principle of conserving items of local heritage significance.

Conclusion

For the reasons outlined above, we respectfully request that the Department refuse the development application in its current form. At a minimum, **the proposal should be substantially redesigned to:**

1. allow vehicular access to a more suitable design that less compromises Rangers Avenue traffic flows, particularly with respect to the impact on the Rangers Avenue/Park Avenue roundabout; **and**
2. retain and integrate the four (4) Federation-style houses into the Development, thus preserving Mosman’s heritage values; **or**
3. In the alternative, removing the four (4) Federation properties (namely Nos. 15, 17, 21 & 23) from the Development.

We contend that by variously adopting the above considerations, any ‘revised’ development will better align with the objectives of the EP&A Act, the SSD Guidelines, and the community’s legitimate expectations for a safe, sustainable, and heritage-sensitive development.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'M.K. Weston.', written in a cursive style.

M.K. Weston
(For & on behalf of M K Weston & Dr. L E Weston)

3/9-11 Park Avenue, Mosman

16 December 2025