

FORMAL OBJECTION to STATE SIGNIFICANT DEVELOPMENT – SSD 9627246 11-23 Rangers Avenue, Mosman

As a longstanding resident of Holt Avenue, Mosman I am writing to object to the Development Application SSD-9627246 for 11-23 Rangers Avenue, Mosman.

As a near neighbour directly to the north of the proposed development and across Bloxsome Lane I will be significantly and adversely affected by the inappropriate massive scale and bulk of this proposal, its excessive dominance in the landscape for this land size and location, its overwhelming height, proximity and continuous mass resulting in a total loss of privacy into my living areas and gardens, loss of existing skyline and harbour district views, increased noise, traffic congestion in an already constrained area, loss of landscape and leafy surroundings with the significant removal of trees and environmental impacts.

There appears to be very little consideration by the applicant in their proposal regarding the northern aspect from Holt Avenue or to the Holt Estate Heritage Conservation Area to the immediate north. This area is zoned C4 Environmental Living, a permanent low-scale, low-density residential environment with a high level of residential amenity and therefore requires a high level of design to be considered at this interface (defined by Bloxsome Lane) which is lacking in the proposal or ignored.

It is very concerning that this development would deliver a lasting detrimental impact on the wider neighbourhood and community if approved.

A number of specific concerns are outlined below in more detail:

800 Metre Rule - Walking Distance and Safety

- None of the properties from 11-23 Rangers Avenue are within 800m walking distance of the Cremorne Town Centre and therefore do not qualify for LMR Outer Area controls. Walking distance is defined under the Housing SEPP as *“the shortest distance between 2 points measured along a route that may be safely walked by a pedestrian using as far as practicable, public footpaths and pedestrian crossings”*
- To meet the 800m distance, the applicant has chosen a walking route that crosses Spofforth Street at the Holt Avenue intersection. This is not a safe crossing and would involve stepping into moving traffic with no pedestrian priority. Spofforth Street is a busy arterial road with a history of traffic congestion and safety issues. This route also does not use public footpaths as Bloxsome Lane and Bardwell Lane do not have adequate public footpaths and require pedestrians to walk with the carriageway of these narrow lanes. This intersection also has a long history of car accidents.
(A documented history of traffic accidents at this intersection is attached)
- The Traffic & Parking Impact Assessment of 19 November 2025 prepared by the applicant’s JMT Consulting does not critically assess the safety of pedestrians crossing at the intersection of Spofforth Street and Holt Avenue.

- The affected residents of Holt Avenue commissioned McLaren Traffic Engineering to perform a traffic survey at the Spofforth Street and Holt Avenue intersection to assess traffic volumes, walking distance and safety for pedestrians crossing there. It was concluded that it was not safe for pedestrians to cross at this intersection and the development site was not within the 800m walking distance as defined in the SEPP Housing.
(*The Traffic and Walking Distance Assessment Report is attached to this submission*)
- Safe marked crossings exist nearby. The applicant has chosen to ignore these existing safe crossings either via signal crossing at Military Road and Spofforth Street or via the marked pedestrian crossing further south at Cranbrook Avenue. When these crossings are used the walking distance to Cremorne Town Centre exceeds 800m.
- Due to our concerns with the accuracy and completeness of the applicants walking-distance assessment the affected residents commissioned an independent licensed surveyor to undertake an independent survey of walking distances using all possible pedestrian routes using formalised pedestrian crossings or signalled intersections.
(*The Surveyors report is attached to this submission*)

The Proposal does not meet the Housing SEPP walking-distance thresholds and should not be assessed under the Low and Mid-Rise Housing provisions. I request that the department denies the application on the basis no evidence has been provided to support the applicant's proposed route meets the 'walking distance' in the housing SEPP.

Built Form Transition between C4 and R3 zones

- C4 Environmental Living zones such as the Holt Estate Conservation Area including Holt Avenue were excluded from the LMR policy to preserve their ecological, aesthetic and landscape significance. This reflects a deliberate policy to protect scenic and landscape integrity.
- Built form transition in adjoining R3 Medium Density residential zones becomes a must and needs to be carefully designed to protect the scale, character and landscape qualities of the neighbouring environmental living area.
- In this case there is no built form transition in the design.

The **massive scale, bulk and height and continual vertical mass** of the proposed building is an abrupt and disproportionate transition in scale.

This is exacerbated by the development exceeding the maximum permissible height, even after applying the full affordable housing bonus. This height breach results in an additional level of mass which deepens the sense of enclosure and increases the extent of view loss.

The northern elevation presents a 5-6 storey built form facing 1-2 storey dwellings along Holt Avenue. On Architectural elevations there is no meaningful upper level stepping back or modulation with the building being a single tall form. This is particularly unreasonable on the northern interface and will impact not only Holt Avenue residents but also the residents as you look further northward up the hill.

- The building is in stark contrast to the existing character to the north and to the southern foreshore slopes and completely out of place.

While the building may be in the LMR this designation does not extend to the land

immediately to the north, east or south of the site. C4 Environmental Living zone will never permit development of a comparable scale. The site remains bound on three sides by areas where low-rise or established development controls apply. The proposed site will not blend in over time and would remain visually and spatially isolated from comparable development resulting in an unresolved and abrupt interface with surrounding neighbourhoods.

- The building occupies a substantial proportion of the visible sky plane when viewed from adjoining rear yards and internal living spaces.
- Instead of looking out from our houses at the sky and open district views we will be looking at a massive building.

NOTE: No architectural impact showing the scale for the Northern aspect from Holt Avenue was provided. Only desk top images taken from old real estate sales have been provided - not a substitute.

View Loss and View Sharing

I currently enjoy open district and skyline views across the rear boundary to the south, east and west from my internal living areas and back deck at the rear of my property. This is an important part of my daily amenity where I have my morning coffee, lunch or dinner and take in the outlook and are highly valued by me. The proposed development would completely obstruct these views to the south and east with severe loss of skyline overall, replaced by a massive building a short distance away.

The loss of these views and privacy is significant resulting in a permanent loss of amenity. The bulk and scale of the development provides no view-sharing with a built form that is inconsistent with view sharing expectations of adjoining low-scale residential properties. This is an unreasonable environmental impact.

The View Impact Assessment provided has a number of incorrect statements and omissions. The VIA incorrectly labels the northern outlook as limited, it asserts the building is 'background built form' which is factually incorrect. From Holt Avenue the building forms a dominant foreground mass that will substantially block skyline and harbour views. For some Holt Avenue residents this building is only a few metres away from the rear boundary of their properties hugely affecting their privacy, any reasonable amenity at all with direct overlooking from building balconies into their internal living spaces and their only view being the building itself. This can't be mitigated by adequate landscaping with the restricted soil depth in this area due to the built form.

The applicant has not provided any visual analysis from the north, including from Holt Avenue, Spencer Road and other areas in the Holt Estate Heritage Conservation Area.

A revised Visual Impact Assessment should be required to include a comprehensive assessment from the north, Holt Avenue and the Holt Estate HCA.

Impact on Heritage Areas

The Holt Avenue and Holt Estate Conservation Area and surrounding streets are among Mosman's most aesthetic and iconic streetscapes.

The Heritage Impact Statement (HIS) downplays the significance of the Holt Estate HCA in an attempt to reduce the significance and therefore the sensitivity of the HCA.

The Holt Estate HCA is characterised by low-scale built form, mature trees, vegetated ridgeline backdrops and cohesive roof patterns with high heritage significance that cannot be ignored.

The scale, bulk and siting of the proposed development will provide a permanent monolithic backdrop for the surrounding area and dominate the streetscape, rather than harmonising with the ridgeline and heritage context.

The simple reliance by the HIS on the LMR legislation to justify the maximum height and FSR has resulted in an extreme massing outcome that shows no regard for the surrounding context.

Due to the shortcomings of the applicant's assessment, a group of directly impacted residents on Holt Avenue have commissioned an independent Heritage Consultant to review and assess the proposal and its impacts on the heritage significance and setting of the Holt Estate HCA. (A Heritage and Visual Impact Report will be submitted separately).

Misalignment with State Significant Development (SSD) Policy Intent

- While the development technically qualifies as a State Significant Development due to its high estimated cost and inclusion of an affordable housing component, the project is not genuinely intended to provide affordable housing and is only included to exploit this to facilitate a luxury harbour/CBD view residential apartment complex.
- Approval of this project under the SSD pathway would undermine the intent of the NSW Government's State Development policy, effectively setting a precedent allowing luxury developments to bypass local planning controls under the guise of affordable housing.

Traffic and Access Impacts, Parking, Noise, Construction, Environmental Impacts

Should the development go ahead:

The development will significantly increase **traffic** on Rangers Avenue and funnel traffic onto Holt Avenue and other access roads during construction and after completion. These are already gridlocked relatively narrow thoroughfares during peak hours during the week and on weekends.

The **Traffic Impact Assessment** has focused on Rangers Avenue and does not adequately address the likelihood that additional vehicles will seek to park and circulate on Holt Avenue and nearby streets.

Off-street **Parking** is already constrained with very little available on Rangers Avenue and very few on Holt Avenue at any time.

There is limited Public Transport available, contained pedestrian pathways and no capacity to absorb a development of this scale.

Residents are also justifiably concerned about the **demolition, major excavation** of large amounts of sandstone material (estimate of minimum 10m depth across the site and likely more), the timeframe of the **construction phase**, the **impact** of vibration, settlement and structural integrity of neighbouring properties, **noise** as well as other **construction related issues**.

The **zone of influence from vibration and settlement** is stated to be 2x the excavation depth, so potentially extending up to 20m from the boundary. **This is significant for the neighbouring residents and should be modelled.**

A **noise and vibration analysis** should also be undertaken.

A few initial questions come to mind

- How will Rangers Avenue cope with the increased traffic volumes from a development of this size (with 91 car spaces for approximately 100 additional residents)?
- How will Rangers Avenue cope with a 3Tonne truck limit from Avenue Road to Spofforth Street during a long excavation and construction phase and for trade deliveries?
- The applicant and the architects have indicated a ballpark number of 124 construction jobs at any one time. Where are they parking over the number of years this project would take? This would not be possible on the construction site.
- How long will the excavation stage take with potentially hard sandstone? Noise impact?
- What methods will be used to excavate the sandstone? What impact on noise and vibration do they have?
- What is the impact on the water course and water flows during excavation and through the site, and to the southern neighbours and to Mosman Bay?

Wind Tunnel and Southerly Breeze Impacts

- The impacts on local wind patterns could diminish the liveability of neighbouring properties and should be fully assessed and mitigated before any approval of this project.
- The height and bulk of the proposed building may have the potential to create wind tunnels at the east and western ends of the development.
- Sydney is renowned for its southerly breezes during the summer that helps alleviate the heat, which we all enjoy. The residents of Holt Avenue immediately to the north of the proposed site may experience a loss of the natural southerly breeze, reducing ventilation and the amenity of private outdoor areas.
- We are also concerned re potential safety issues with strong southerly winds during the 2+ yearlong construction with a large crane required on site during the construction phase.

Conclusion:

I request this objection be fully considered during the assessment process.

I strongly urge the responsible planning authority to refuse this application entirely.

The development proposal does not satisfy fundamental requirements of the State Environmental Planning Policy (Housing) and should not be assessed under the LMR Housing provisions.

The project reliance on the LMR legislation to justify a massive oversize building that totally dominates and overwhelms the landscape with no regard to the surrounding context and visual impact, inappropriately exploits the affordable housing policy and uplift (though unlikely to be affordable).

The precedent set by this decision will impact our community for decades to come. I trust the planning authority will demonstrate their commitment to heritage protection, appropriate development, and community amenity by refusing this inappropriate proposal.

I welcome additional affordable housing in the Mosman area as part of the Alternative Plan being prepared by Mosman Council.

NOTE:

Two additional reports addressing Heritage and Town Planning are being submitted separately. These have been jointly commissioned by a group of directly impacted residents on Holt Avenue.

Attachments to this submission:

1. Spofforth Street Traffic Accidents report
2. Traffic and Walking Distance Report
3. Surveyor's Report