

Response to Submissions

Prepared for: **Grand Noble Project 1 Pty Ltd**



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Acknowledgment of Country

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Urbis is committed to incorporating our respect for First Nations cultures, peoples and storytelling in our work across the Country. We are proud to have partnered with Darug Nation artist, **Hayley Pigram**, and to profile her artwork – **Sacred River Dreaming**.



The river is the symbol of the Dreaming and the journey of life. The circles and lines represent people meeting and connections across time and space. When we are working in different places, we can still be connected and work towards the same goal.

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Executive Summary

Overview of Submissions

The State Significant Development Application (SSD-96272465) for residential development with in-fill affordable housing at 11–23 Rangers Avenue, Mosman was publicly exhibited between 4 December 2025 and 17 December 2025. During the exhibition period, a total of 185 submissions were received.

These comprised:

- 182 submissions from members of the public,
- Two submissions from public agencies (Transport for NSW and the NSW Department of Climate Change, Energy, the Environment and Water), and
- One submission from Mosman Council.

Of the public submissions received, two submissions expressed support, one provided general comment, two submissions referred to an unrelated development and were not considered relevant, and 177 objected to the proposal.

Mosman Council objected to the proposal, raising concerns primarily in relation to built form, height, visual and heritage impacts, scenic protection, landscaping and deep soil provision, traffic and parking arrangements, waste servicing and compliance with local planning controls. Four technical submissions were also lodged on behalf of residents of Holt Avenue, raising matters relating to visual impact, view loss, heritage impacts, traffic and pedestrian safety, building scale and transitions to adjoining low-density and heritage areas.

The public submissions raised a broad range of issues, with the most common themes relating to:

- traffic congestion and safety, including construction impacts,
- bulk, scale and height of the proposed building,
- heritage and character impacts, particularly in relation to the Holt Estate Heritage Conservation Area,
- visual impacts and view loss,
- adequacy and duration of the affordable housing component,
- landscaping, tree canopy and deep soil provision,
- excavation, geotechnical and groundwater risks, and
- public transport accessibility and parking availability.

Submissions were also received from Transport for NSW and DCCEEW. Both agencies advised that the proposal is unlikely to result in significant impacts within their respective areas of responsibility and raised no objection to the application, subject to standard post-determination requirements.

This Response to Submissions Report has been prepared in accordance with the DPHI State Significant Development Guidelines to address all matters raised by Council, public agencies and the community.

Actions Taken Since Exhibition

Since public exhibition, the Applicant has undertaken further engagement with DPHI, Mosman Council, Transport for NSW and relevant consultants have carefully reviewed the issues raised in submissions.

Amendments to originally issued documentation, as well as additional assessments and design documentation have been prepared to respond to the issues within these submissions, as well as those from other parties. Details on the refinements to the project are explored in detail in Section 3.2, while the amended and additional documentation submitted with this RtS Report is listed in Table 1 below.

Updated Justification and Evaluation

The Environmental Impact Statement (EIS) lodged with the SSDA assessed the proposal against the relevant statutory and strategic planning frameworks and addressed the Secretary's Environmental Assessment Requirements (SEARs). This Response to Submissions (RtS) report builds on that assessment by responding to matters raised during public exhibition and providing updated analysis where required.

Subject to the proposed refinements and implementation of recommended mitigation measures, the proposal is not expected to result in any unacceptable environmental, social or amenity impacts. The development demonstrates strategic and statutory merit and supports the orderly redevelopment of the site to deliver low to medium density housing in a highly accessible inner-suburban location.

The refined scheme improves its response to the surrounding context and environmental considerations while maintaining the residential yield and affordable housing outcomes envisaged by the Housing SEPP. The proposal has been developed with regard to existing and anticipated future development and incorporates targeted design refinements to manage impacts to an acceptable level.

The proposal also enables improvements to the public domain and landscaping supported by increased deep soil provision, enhanced tree canopy planting and a strengthened interface with Rangers Avenue.

Having considered all relevant matters, the proposed development is considered appropriate for the site, consistent with State planning policy and the public interest, and approval is recommended, subject to appropriate conditions of consent.

1 Introduction

This Submissions Report relates to the development of at 11-23 Rangers Avenue, Mosman (**the site**). On behalf of Grand Noble Project 1 Pty Ltd (**the Applicant**), this Submissions Report has been prepared to address matters raised by public agencies, Mosman Council, community members and other stakeholders throughout the public exhibition period.

The State Significant Development Application (**SSDA**). SSDA was lodged with the Department of Planning, Housing and Infrastructure (**DPHI**) in November 2025 as (SSD-96272465). The application was publicly exhibited for 14 days between 4 December 2025 and 17 December 2025,

This Submissions Report has been prepared in accordance with the DPHI *State Significant Development Guidelines – Preparing a Submissions Report (Appendix C) July 2021*.

1.1 Exhibited Project

The SSDA (as lodged) seeks consent for Residential Development with in-fill affordable housing including:

- demolition of existing site structures
- construction of a part six, part seven-storey building set above a basement level, comprising:
 - 44 apartments, including 10 affordable housing apartments to be managed by CHP for 15 years
 - basement car parking for 91 cars
 - communal open spaces on level one
- associated works including site preparation, tree removal, excavation, landscaping and infrastructure works.

The proposal is made under Chapter 2, Part 2, Division 1 of the State Environmental Planning Policy (Housing) 2021 (**Housing SEPP**) as the proposal includes more than 10% affordable housing and is located within an accessible area.

The proposal includes 15% GFA of affordable housing to be managed by a registered community housing provider for a 15-year period to utilise the height and floor space bonuses in the Housing SEPP. Refer to **Appendix K** for further information regarding Bridge Housing (ABN 55 760 055 094), the chosen community housing provider.

1.2 Supporting Documentation

This report is supported by the following technical reports and documentation, amended as part of this response to submissions.

Table 1 Supporting Documentation

RtS Appendix	Report	Prepared By
Appendix A	Response to Submissions Table	Urbis
Appendix B	Updated Mitigation Measures	Urbis
Appendix C	Updated Statutory Compliance Table	Urbis
Appendix D	Updated Design Verification Statement	Woods Bagot
Appendix E	Updated Architectural Drawings	Woods Bagot
Appendix F	ADG Design Criteria Checklist	Woods Bagot
Appendix G	Stormwater Plans	BE&G
Appendix H	Letter of Response to Stormwater Comments	BE&G
Appendix I	Letter of Response to Flooding Comments	BE&G
Appendix J	Letter of Response to Traffic Impact Assessment	JMT Consulting
Appendix K	Updated Visual Impact Assessment	Urbis
Appendix L	Updated Operational Waste Management Plan	Elephant's Foot
Appendix M	Landscape Plans	Wyer & Co
Appendix N	Updated Geotechnical Investigation Report	Ei Australia
Appendix O	Letter of Response to Heritage Impact Statement	Urbis
Appendix P	Updated BCA Report	Certitude
Appendix S	Updated Engagement Report	Urbis
Appendix T	Updated Preliminary Site Investigation	Ei Australia
Appendix U	Updated Hydrogeological Report	Ei Australia
Appendix V	BASIX	E-Labs

2 Analysis of Submissions

This section provides a summary of the submissions received including a breakdown of respondent type, nature/ position and number of submissions received.

All submissions were managed by DPHI, which included registering and uploading the submissions onto the 'Major Projects website' (SSD-96272465).

2.1 Breakdown of Submissions

The SSDA was publicly exhibited between 4 December 2025 to 17 December 2025.

Urbis have analysed the submissions (**Appendix A**) confirming:

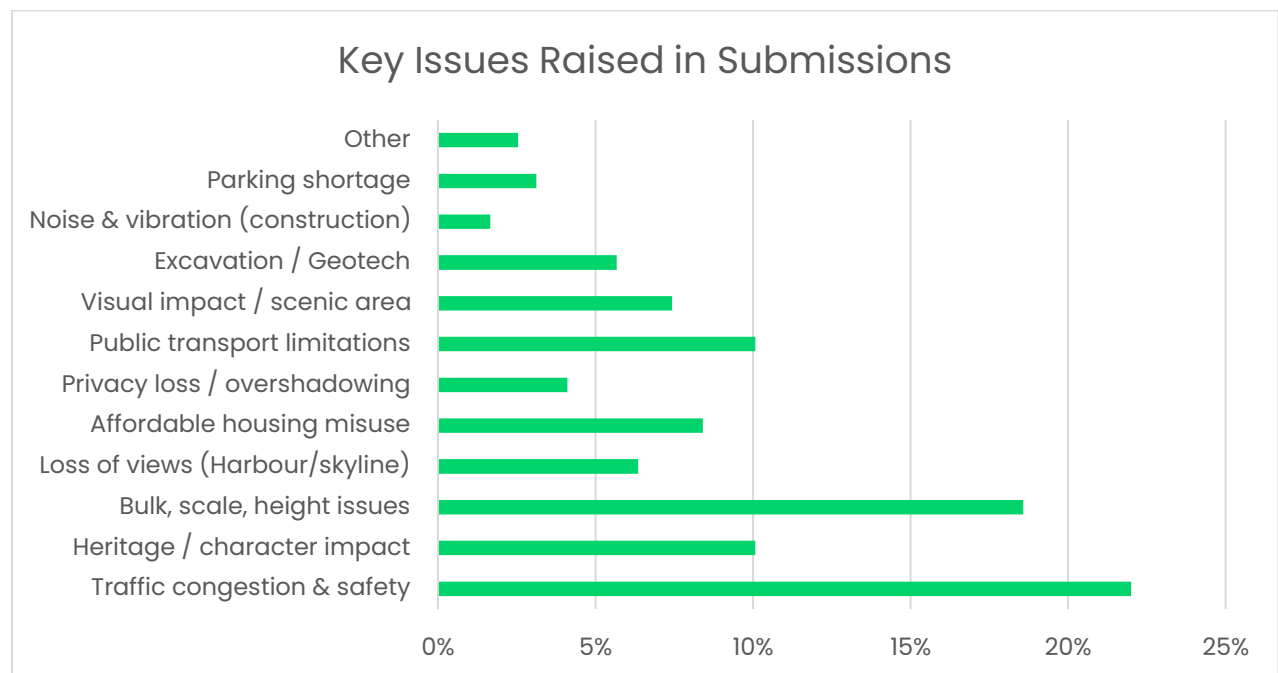
- 182 public submissions received from members of the local community and individuals,
- 2 advices received from public agencies and
- 1 submission received from Mosman Council.

All submissions were managed by the DPIE, which included registering and uploading the submissions onto the 'Major Projects website' (**SSD-96272465**).

Of the public submissions, 2 people supported the project and 177 objected to the project, 1 provided general comment and 2 comments were made in error (referring to a different submission).

A breakdown of the submissions made, and issues raised is provided in the graph in **Figure 1** below.

Figure 1 Key Issues Raised in Submissions



A preliminary assessment of the proposal has been undertaken by DPHI. Issues arising from the preliminary assessment are outlined in DPHI's *Key Issues* letter received on the 19 January 2026. In addition, advice was received from the following government agencies:

- Department of Climate Change, Energy, the Environment and Water (**DCCEEW**)
- Transport for NSW (**TfNSW**)
- Mosman Council (**Council**).

A response to the issues raised in DPHI's letter, as well as each public agency submission is included within the Response to Submissions table at **Section 4**.

The table below provides a summary of the submissions received and their breakdown.

Table 2 Summary of Public Submissions

Source	Position	Number of Submissions
Technical Submissions:	Support	0
GBA Heritage, McLaren Traffic Engineering, Northern Development Assessment, SurvPlan	Neutral / Comment	0
	Object	4
General Public	Support	2
	Neutral / Comment	3
	Object	177
Councils and Agency	Support	0
Mosman Council, TfNSW, DCCEEW	Neutral / Comment	2
	Object	1

2.2 Categorising of Submissions

2.2.1 DPHI, Council and Agency Submissions

DPHI issued a Key Issues letter dated 16 January 2026, requesting additional information and design refinement. A total of two (2) submissions were received from government agencies including Transport for New South Wales (**TfNSW**) and NSW Department of Climate Change, Energy, the Environment and Water (**DCCEEW**) during the public exhibition of the SSDA. Notably, both advice have confirmed that they are satisfied with the information provided and no further requirements are required during the planning assessment stage. A submission was received from Mosman Council which objected to the proposal.

A summary of the government agency and Council submissions is provided in **Table 3**.

Table 3 Summary of Council and public agency submissions

Public Authority	Position
DPHI	- Requests increased side setbacks and building separation to adjoining properties towards the east and west direction, to improve amenity outcomes and enable additional landscaping and deep soil area. - Raises concerns the proposed basement with zero setbacks and suggests a reduced car park basement footprint to increase setbacks and enable deep soil planting along the Bloxsome Lane boundary. - Identifies built form and character concerns, including dominant mass and limited façade articulation. Requests additional façade

modulation and improved transition to the lower scale, built form and heritage conservation areas to the north.

- Requests further heritage interface analysis, including additional sections and contextual elevations demonstrating how impacts to outlook, sky access and amenity for the adjoining heritage conservation area will be mitigated.
- Requires an updated view impact assessment applying the Tenacity four-step methodology, including additional assessments for Holt Avenue properties and public domain impacts around Mosman Bay.
- Seeks clarifications regarding parking regarding the Housing SEPP requirements and clarification of space allocations, EV charging provision and additional swept path analysis/vehicle manoeuvring information.
- Raises landscaping and tree canopy matters, including recalculation of deep soil per ADG definition, confirmation of 30% landscaped area, and additional planting/soil volume details.
- Requests clarification of GFA, amended building height information and updated documentation.

Mosman Council

Provided the following comments:

- Objects to the application as currently proposed, citing overdevelopment and a built form response that is not compatible with the local and character, including an excessive scale that creates a dominant street wall.
- Raises concerns regarding building massing and visual impact, noting the building reads as a largely unbroken 78m-long form with insufficient modulation/transition, and that the “three blocks” function visually as one continuous building.
- Identifies non-compliance with building height and wall height controls, stating the development exceeds the maximum height even with the affordable housing uplift, and contending the proposal’s height presentation is amplified by slope and excavation.
- Objects on Scenic Protection Area grounds, stating the entire site is within Mosman’s Scenic Protection Area and the proposal fails to demonstrate measures to minimise visual impact and maintain the existing natural landscape/landform, particularly given wholesale vegetation removal and extensive excavation.
- Raises concerns regarding view sharing and amenity impacts, stating the proposal prioritises views from within the development, fails to demonstrate minimisation of view loss to surrounding properties, provides inadequate separation and transitions, and may worsen already constrained solar access south of Rangers Avenue.
- Raises concerns on deep soil and landscaping outcomes, disputing the applicant’s deep soil calculations and identifying a shortfall against minimum requirements, with limited deep soil along boundaries reducing the opportunity for meaningful canopy trees and screening (noting much landscape is podium planting).

- Suggests amendments to traffic/parking access and safety arrangements, citing driveway and basement design non-compliances (including swept path constraints, sight line/safety deficiencies, and internal layout conflicts) against relevant standards and Council controls.
- Raises concerns to waste servicing and associated traffic impacts, stating kerbside waste collection on Rangers Avenue is unreasonable for a 44-dwelling development, would disrupt a high-volume road, and should be addressed through on-site waste collection rather than reliance on Council operations and on-street conditions.

TfNSW	TfNSW advised that the proposal is unlikely to have a significant impact on the classified road network and therefore have no additional requirements for the proposed works.
DCCEEW	DCCEEW is satisfied with the information provided in the Environmental Impact Statement with a post-determination recommendation to obtain a Water Access Licence (WAL) for the maximum predicted water take.

2.2.2 Technical Submissions

A total of four (4) technical submissions from consultants were received during the public exhibition of the SSDA. These objections were prepared on behalf of the residential properties at 18-36 Holt Avenue, Mosman. A summary of the technical submissions is provided in **Table 4**.

Technical Consultant	Position
GBA Heritage	Provided the following comments: ▪ Objects to the application as currently proposed, highlighting that the current information as submitted do not fully address the visual and heritage impacts on the site, and that a major modification is warranted. ▪ Raises concerns on the lack of information in the Visual Impact Assessment (VIA) report as submitted, arguing the photomontages have selected locations from a long and elevated distance from the proposal, or where the proposal is completely obscured by large trees and largely fail to show the true bulk and scale. The submission also identified that the VIA lacked of meaningful viewpoints from the north. ▪ Objects to major view and amenity impacts on properties along Holt Avenue, contending the proposal would block southerly harbour views and views of the Sydney Harbour Bridge from main entertaining areas of multiple dwellings. ▪ Objects that the Heritage Impact Assessment (HIS) omits 5 heritage items in the vicinity (Heritage Item I201, I422, I379, I380 and I439), asserting that multiple listed items are ignored, undermining the completeness of the heritage assessment and SEARs compliance. ▪ Objects to heritage impacts being underestimated, stating the HIS downplays the sensitivity/significance of the Holt Estate HCA and

incorrectly relies on street trees as mitigation, despite the building's predicted strong visual presence.

- Raises concern on the proposal's proximity to the Holt Estate Heritage Conservation Area (**HCA**), noting the proposal's scale with a c70m long massing with only 3m setback to the east and west is an appalling outcome for the surrounding residential suburban character areas.
- Objects to insufficient deep soil and canopy planting along the northern boundary, stating the basement excavation runs hard up against Bloxsome Lane, leaving no capacity for deep-soil canopy trees to screen the development from the HCA.

McLaren Traffic
Engineering

Provided the following comments

- Objects to the applicant's walking distance assessment under the definition of the Housing SEPP 2021, however, it has been confirmed by DPHI that the site satisfies the walking distance requirement for the Low and Mid Rise housing outer area.
- Raises concerns that pedestrian safety at the Spofforth Street / Holt Avenue intersection has not been properly assessed, noting the commissioned traffic report does not critically consider the safety of crossing Spofforth Street at the relevant intersection.
- Highlights that Spofforth Street functions as a higher-order road, citing observed peak two-way traffic volumes exceeding 1,000 in both the AM and PM peak hour periods and noting Spofforth Street is a classified Regional Road, increasing pedestrian crossing difficulty.
- States that the expected pedestrian delay is unacceptable, citing SIDRA-based assessment indicating average delays of 40.1s in the AM peak and 46.7s on the PM peak, both exceeding the 30s maximum acceptable pedestrian delay referenced in the AS1742.10 supplement.
- Notes that intersection conditions further worsen crossing safety, stating that intersection turning movements from minor roads and pedestrians crossing in an unsafe gap can increase the risks of pedestrian strikes.

Northern
Development
Assessment

Provided the following comments:

- Notes that the calculation of walking distance to Cremorne Centre relies on a pedestrian route that crosses Spofforth Street at Holt Avenue and doesn't satisfy the Housing SEPP as the kerb includes no pedestrian crossing, no traffic signal, no zebra marking and no form of pedestrian priority. However, the classification of the Low and Mid Rise Outer Area has been accepted by DPHI.
- Raises concern that the proposed building height and scale is of medium to high density and does not accommodate a comparable scale to the adjacent low-rise character of Holt Avenue.
- Highlights that the Clause 4.6 justifications to the exceedance to building height is not supported as the height leads to significant view loss, visual dominance and amenity impacts for Holt Avenue properties.

- The VIA does not adequately address the Tenacity Planning Principle and the 4-step process for assessment of private view loss, suggesting that the proposal will lead to view losses from living areas, balconies and private open spaces of Holt Avenue dwellings on the Sydney Harbour Bridge, Sydney CBD skyline, Barangaroo and the Sydney Harbour.
- States that the proposal does not achieve meaning separation in terms of visual, spatial and amenity as is located directly adjacent to low-density Holt Estate Heritage Conservation Area with separation provided merely by Bloxsome Lane which is a narrow laneway. This leads to privacy impacts for Holt Avenue properties.
- The proposal will also lead to a wide range of secondary amenity impacts to the existing residents including strain on the surrounding local road network, noise impacts higher density and construction works, loss of landscape character and will lead to cumulative amenity impacts.

SurvPlan	Included a Survey Plan that provided 5 separate routes connecting the site at 11-23 Rangers Avenue and Cremorne Town Centre.
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2.2.3 Public Submissions

A total of 182 submissions from the community were received during the public exhibition of the SSDA. A summary of the public submissions is provided in Table 5.

Category	Position
Traffic congestion & safety	22% of all submissions arguments raised concerns regarding Traffic congestion and safety, including: ▪ The proposal will worsen traffic on Rangers Avenue, Bloxsome Lane, Holt Avenue and connecting roads. ▪ Holt Avenue and Spofforth Street are dangerous intersections. Spofforth street has moderate to high fatal and serious injuries with only a 3-star AusRAP rating. ▪ Construction vehicles including 12.5 heavy rigid trucks, medium rigid trucks and construction plant haulage vehicles is infeasible on site as Rangers Avenue is a narrow, winding residential street with a 3-tonne Gross Vehicle Mass (GVM) limit. ▪ Traffic during construction will cause considerable chaos and has not been addressed/underestimated in the Traffic Impact Assessment. There is no feasible location for construction staging without significant interference with traffic and emergency access.
Heritage / character impact	10% of all submissions raised concerns with regards to the proposal's impacts on heritage items and the character of the locality, including:

- The proposal is out of character with the Holt Avenue Conservation Area and Spencer Street and the surrounding built form.
- The proposal will set a precedent and permanently alter the low density residential character of Mosman's most aesthetic and iconic areas
- There is a lack of assessment of cumulative impacts and the capacity of the immediate area, such as capability of roads, parking, local schools, public amenities, supermarkets and community infrastructure to absorb additional population.
- The HIS failed to address the impacts of the proposal on Holt Estate HCA, and how it disrupts the rhythm of the street. The HIS understates the heritage value of the Holt HCA.

Bulk, scale, height issues	19% of all submissions raised concerns on the bulk, scale and height of the proposed development, including: ▪ The statement that the proposed height and scale (22.75m in height) is overdevelopment, out of character and not commensurate with the adjacent lower-scale and heritage sensitive building typology ▪ The proposal is not suitable as it proposes height and bulk beside C4 Environmental Living Land and Scenic Protection areas that are intentionally excluded from LMR. ▪ There is no proper transition in bulk, scale and height between the proposal and the surrounding area. Highest building in the surrounding area is only 4 storeys. Bloxsome Lane is insufficient to provide a transition to the Holt Avenue low density heritage-built form and the C4 Environmental Living land. ▪ The proposal's bulk and scale will cause site isolation and reduce development potential for 9 & 9A Rangers Avenue, 25 and 27 Rangers Avenue.
Loss of views (Harbour/skyline)	6% of all submissions raised concerns that the proposal will have an impact on existing view lines, including: ▪ The proposal will remove the city skyline and Harbour Bridge views for many homes, specifically Holt Avenue residents within the Holt Estate Heritage Conservation Area (C03). This will result in a severe and irreversible loss of amenity. ▪ The photomontage view from Mosman Bay on the Sydney Harbour shows that proposal will impose itself and cause visual intrusion.
Affordable housing misuse	8% of all submissions raised concerns that the proposal will have an impact on affordable housing misuse, including: ▪ Affordable housing is limited to the scale of non-compliance (only 10 affordable units) and permanent impacts to the Mosman community is created.

	- Affordable housing acts as a mechanism to access the SSD pathway for higher density luxury housing rather than responding to affordable housing needs. - Rental guides for in-fill affordable housing is not provided for the proposal, and the rental prices is not likely to be feasible for rent essential workers, given the site location and the views towards Mosman Bay. - Affordable housing is only provided for 15 years with no long-term community benefit. Affordability benefits are temporary, while built form impacts are permanent.
Privacy loss / overshadowing	4% of all submissions raised concerns that the proposal will have an impact on loss of privacy and overshadowing of their premise, including: - The proposal's building height and massing will cause overshadowing of neighbouring properties. Houses south of the development will be most significantly impacted. Oswald, Park and Brierley Street will be impacted as well. - The height, scale and proximity of the proposal will lead to increased loss of privacy by overlooking onto neighbouring dwellings and private open spaces
Public transport limitations	10% of all submissions raised concerns that the proposed scale of development is not suitable due to the site's lack of public transport opportunities, including: - Does not satisfy 800m walking distance to Cremorne Town Centre and outside of the LMR outer area as there is no pedestrian footpath on Bloxsome Lane, which does not provide lawful, safe and continuous walking network. Crossing along Spofforth Street is also unsafe. The test must be satisfied at 11 Rangers Avenue and not only 23 as the 7 lots are yet to be amalgamated. However, it has been confirmed that the site satisfies the definition of the LMR outer area under Section 163 of the Housing SEPP. Therefore, the concerns raised in the submissions regarding walking distances is not applicable. - The site lacks genuine proximity to high-frequency public transport. There are no nearby train station and bus services are not frequent. Nearby public transport is limited to the infrequent route 230 at Avenue Road. Even bus services at Military Road are already at maximum capacity.
Visual impact / scenic area	7% of all submissions raised concerns on the submitted Visual Impact Assessment (VIA) and the proposal's visual impact on the site's scenic area, including: - The Visual Impact Assessment fails to address the impacts from the North (Holt Avenue, Spencer Road, Holt Estate Heritage Conservation Area) - The removal of 21 trees negatively impacts the well-established environment and landscape. There are insufficient deep-soil

and landscaping. Basement carpark will prevent any new trees from reaching full height or maturity

- The proposal fails when assessed against the *Tenacity v Warringah* (2004) Land and Environment Court decision regarding view-sharing principles and does not demonstrate that reasonable design alternatives including reduced height and altered massing were considered to minimise view loss.
- Site is located on a ridgeline and will be visible from a broad surrounding area and will create permanent skyline interruption and visual dominance

Excavation / Geotech

6% of all submissions raised concerns that the proposal will have an impact on Geotech and groundwater aspects of the site, including:

- That the proposal will involve deep excavation of approximately 10m across most of the 3,594 sqm site to construct 2.5 basement levels within 30cm from the Federation dwelling at 25 Rangers Avenue. The estimated total volume of substance to be excavated is not provided. This constitutes bulk excavations and will have impacts on structural stability, traffic impacts and public safety. It will also activate protection mandates of Clause 98E of the EP&A Regulation 2000.
- The proposed two-level basement carpark requires excavation of 10m and the site is constrained by sloping topography, sandstone and rock formations, close proximity to neighbouring properties. There are no guarantees that structural damage will not occur to roads, or neighbouring properties. The proposal may cause destabilising of Rangers Avenue, endangering of properties below the cliff on Park Avenue, and impact neighbouring foundations along Holt Avenue
- Excavation into porous sandstone increases risks of flooding, landslides and structural instability
- Deep excavation can intercept or redirect groundwater, leading to ongoing drainage issues, increased pressure on retaining walls or unexpected seepage into people's homes. This is especially the case as historical records show that a waterfall once existed very close to the site and the area is a natural drainage path for water.

Noise & vibration
(construction)

2% of all submissions raised concerns that the construction of the proposed development will have an impact on existing noise and vibration surrounding the site, thus impacting the amenity of the community, including:

- Properties at Holt Avenue, Mosman will suffer from extended periods of noise, vibration, dust and construction related traffic. This is exacerbated by the fact that the area includes heritage homes that are more brittle than modern structures and laid with lime mortar that is far more liable to be shaken apart by vibrations than modern Portland cement mortars.

- Concerns that the proposal would cause vibrational weakening to the elevated carport of the Heritage-listed houses of 32, 34-36, 36A and 38 Park Avenue and the weakening of the cliff face behind the residences of Park Avenue.
- The proposed construction works will require a large crane higher than 30m that will swing over Holt Avenue and Ranger Avenue. This will cause safety issues during strong southerly winds.

Parking shortage

3% of all submissions raised concerns that the proposal will exacerbate the parking shortage issue in Mosman, including:

- Many residents are reliant on on-street parking due to the Heritage Conservation Area, and the proposal will propose further strain on on-street parking. Street parking is currently already at capacity at night in Holt Avenue, Bardwell Lane and Spofforth Avenue.
- Worker parking during the construction phase has not been considered
- As the proposal will mainly include 3 bedroom apartments and more, each apartment will conservatively require three cars, and the proposal will fall short of what is required. It is also unsure how spaces will be allocated and whether affordable units will have car spaces.

Other

3% of all submissions raised other comments that are not classified in the above categories, including:

- Concerns that there was limited community engagement for this proposal. Many properties directly affected were not consulted prior to the lodgement of the application.
 - Mitigation for construction impacts, waste servicing, stormwater and accessibility is deferred to future construction management plans and not adequately assessed prior to approval.
 - Approving the application prior to the Mosman Council Master Plan is published is premature and represents "ad-hoc" planning.
 - Utilising SSD for routine residential housing, LMR infill reforms for density and height represents centralisation of planning power and attack on democratic process.
-

3 Actions Taken Since Exhibition

In response to the key issues raised within the submissions, design refinement and clarifications have been made to the proposed development since public exhibition.

This section summarises the changes that have been made to the project since its public exhibition. It also outlines additional assessment undertaken to respond to the concerns raised with the public agency, organisation and public submissions.

3.1 Further Engagement

Department of Planning Housing and Infrastructure

On 5 February 2026, the Applicant met with officers of the Department of Planning, Housing and Infrastructure (DPHI) to discuss issues raised in agency, Council and public submissions and to clarify matters relevant to the Department's assessment of the application prior to the preparation of the Response to Submissions. The meeting addressed aspects of the proposal relevant to the assessment process, including the built form, building envelope and the supporting technical documentation.

The discussion focused on the relationship of the proposed development to the site context and public domain, including matters relating to basement configuration, car parking and servicing arrangements, landscape outcomes, and the preparation of supporting material such as visual analysis and waste management documentation. The Applicant's approach to community engagement and the preparation of supporting assessment material in accordance with relevant guidelines was also discussed.

A further meeting was held with DPHI officers on 26 March 2026. This meeting considered design refinements to the building envelope, including adjustments to setbacks, massing and articulation, together with refinements to the basement layout, landscape structure and supporting documentation. Updated visual material and contextual information were also reviewed.

The matters discussed during these meetings have informed the preparation of this Response to Submissions and are reflected in the amended plans and supporting documentation submitted with this response.

Community Webinar

The Proponent hosted an online community webinar on Wednesday, 10 December 2025. The webinar was undertaken in addition to the pre-lodgement consultation activities documented in the Environmental Impact Statement (EIS). The session provided an overview of the proposal and an opportunity for community members to ask questions and seek clarification.

Mosman Council

The project team met with Council's civil engineering representative to discuss the stormwater and civil matters raised in Council's correspondence dated 17 December 2025. The discussion addressed drainage connection arrangements and discharge points. The agreed outcome has been incorporated into the updated stormwater design, which forms part of the documentation submitted in this Response to Submissions report.

Request to Insect Views from Nearby Dwellings

As part of further engagement following public exhibition, the Applicant sought access neighbouring dwellings to inspect and photograph existing views to inform an updated View Impact Assessment.

On 28 January 2026, a letter was issued to residents of properties along Holt Avenue, including 11, 16, 18, 20, 22, 26, 28, 34, 36 and 44 Holt Avenue, Mosman, requesting access to their properties. The owners of 16, 18, 20, 22, 26, 28, 34 and 36 Holt Avenue advised that access would not be provided.

A second request was issued on 16 April 2026 during preparation of the Response to Submissions report, seeking reconsideration of access to undertake surveyed photographs from the identified Holt Avenue properties, as requested in submissions. Residents responded by outlining conditions under which access would be considered. While not all conditions could be accommodated, access was granted to properties at 16, 18, 26 and 28 Holt Avenue to enable a more accurate assessment of potential view impacts of the proposed development.

Urbis also arranged for representatives from the DPHI to be present on 30 April 2026 during the inspections of the above properties to observe the process.

The updated visual impact and view sharing assessment has been prepared using viewpoints from these properties, together with other publicly available information. The methodology used to prepare the photomontages complies with the Land and Environment Court of NSW photomontage policy, and the resulting images can be relied upon to inform the consent authority.

Transport for NSW

Transport for NSW (TfNSW) were consulted to confirm compliance with the frequent public transport requirements under the Passenger Transport Act 1990, used to define a regular bus service under clause (c). Clause (c) requires that a site be located within 400 metres walking distance of a bus stop serviced by a regular bus service, operating at least one bus per hour:

- i. between 6.00 am and 9.00 pm, Monday to Friday (inclusive), and
- ii. between 8.00 am and 6.00 pm on Saturdays and Sundays.

TfNSW has confirmed that public transport services operate in the vicinity of the site. Bus Route 230, which runs between Milsons Point and Mosman, services stops on Park Avenue (Mosman Stop ID 2088172) and Avenue Road (Mosman Stop ID 2088173). Both stops are located approximately 250 metres from the site, within the required 400-metre walking distance and are easily accessible.

Bus Route 230 operates at regular intervals throughout the week, with more than one service per hour, including on weekends. Operating hours are generally from approximately 4.30 am to 12.30 am, exceeding the minimum service periods specified under clause (c). Accordingly, the site satisfies the frequent public transport requirements.

In addition, Route 230 provides a direct connection to Mosman Bay Wharf, offering access to water-based public transport. From Mosman Bay Wharf, ferry services operate to Circular Quay, with services running at least hourly on Sundays and more frequently on weekdays. This integrated bus and ferry network further enhances public transport choice and provides convenient access to key destinations, including Sydney's CBD.

3.2 Refinements to the Project

The following design updates and refinements respond to the submissions received and further discussions with DPHI.

Importantly, these refinements are changes that fit within the limits set by the project description. These refinements do not change what the application is seeking consent for and therefore an amendment to the proposal is not required.

The table below includes a list of Appendix documents which have been updated for the Response to Submission.

Table 4 List of documents Updated for the Response to Submissions

Appendix C Urbis	Statutory Compliance Table	Updated Civil BG&E Civil Rts report & updated in Appendix A Objects of the Act- the latest amendment to the Act do not apply because the development application was lodged before the new objects commenced. (Application lodged 24/11/2025 and Commencement 15/12/2025). Clause 22A, including Clause 22A(b), is not applicable to the proposed development.
Appendix D Woods Bagot	Design Verification Statement	New window addressing amenity and ADG compliance apartment 4D, architectural drawings amended.
Appendix E Woods Bagot	Architectural Drawings	Updated plans to include side setbacks on all levels. Basement parking numbers and Drawing DA2008 has been amended so numbers are consistent. Height sections and height plane diagrams updated New window to address ADG requirements
Appendix F Woods Bagot	ADG Design Criteria Checklist	Apartment type 4D updated now comply with ADG requirements
Appendix I BG&E Civil	Civil Letter	Updated Civil report now includes MLEP2012
Appendix K Urbis	Visual Impact Analysis	VIA updated to include Private domain Views / photomontages
Appendix P Certitude	BCA Report	Updated plans referenced.
Appendix V E-LAB Consulting	BASIX Certificate	BASIX complete.

Appendix W Urbis	Clause 4.6	Clause 4.6 Variation Request DRAFT – Clause 4.6 includes View Impacts and refinements to the building envelope.
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3.2.1 Basement Design and Deep Soil Provision

In response to DPHI concerns regarding basement setbacks and compromised deep soil zones, the basement footprint has been rationalised and reduced, particularly along the northern boundary.

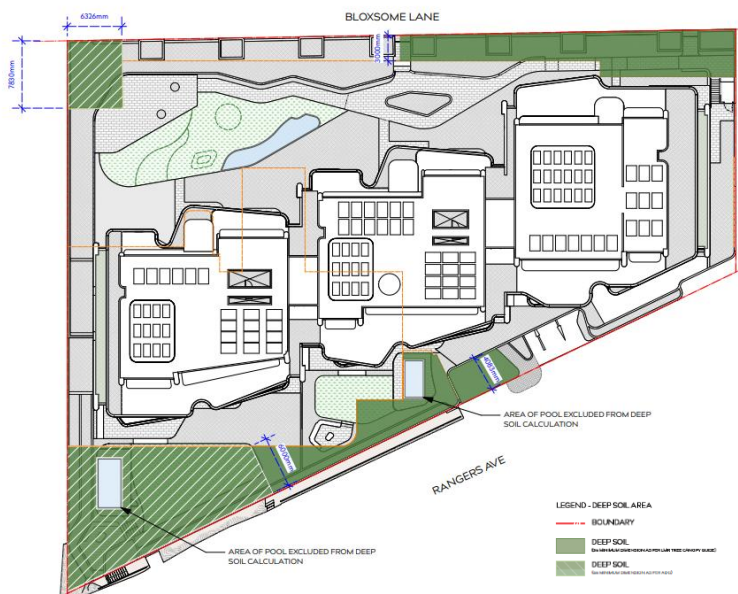
Key outcomes include:

- A 3 m basement setback to the north, enabling a continuous deep soil zone.
- Reconfiguration of basement layout, including adjustments to parking and circulation.
- Refinement of the affordable housing and BTS lobby arrangements.
- Provision of deep soil zones capable of supporting mature tree planting in accordance with the ADG and LMR Tree Canopy Guidelines.

As demonstrated in the Deep Soil Calculations and Landscape Area Diagrams, the proposal now provides 8.1% deep soil under the ADG and 16.2% under the LMR controls, exceeding requirements.

Overall, these refinements represent positive improvements and reinforce the landscape-led design approach, with the building form, basement setbacks and ground plane designed to support tree establishment and long-term canopy cover.

Figure 2 Deep Soil Diagram



Source: Wyer & Co

3.2.2 Side Setbacks and Building Separation

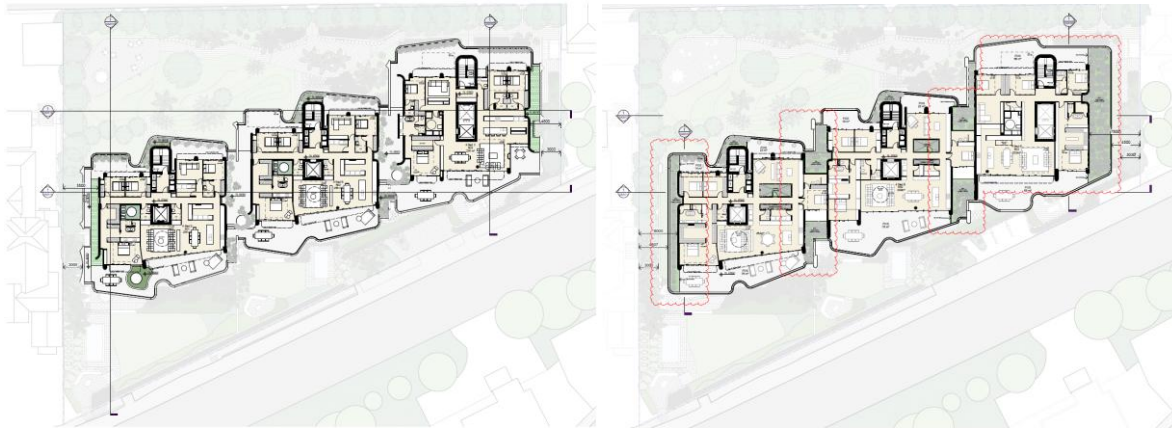
The building envelope has been refined to align with the Apartment Design Guide building separation and setbacks.

Amendments include:

- 3 m side setbacks at Levels G–3, consistent with non-habitable ADG setbacks.
- Increased setbacks to 4.5 m at Levels 4–5
- Further recession of the upper level, with setbacks of 5.9 m to the west and 7.9 m to the east, exceeding ADG non-habitable requirements.

These changes reduce perceived bulk, improve visual separation, enhance privacy and create opportunities for supplementary planting within setback zones. The facades are predominantly non-habitable, with limited and obscured openings, which further reduce overlooking and acoustic impacts.

Figure 3 Comparison of the previously submitted (left) and current (right) Level 6 Plans



Source: Woods Bagot

3.2.3 Built Form and Façade Articulation

In response to concerns regarding bulk, scale and character, the proposed building façades have been further articulated to reinforce the perception of three distinct building volumes rather than a single mass. Key changes include:

- Additional stepping at Levels 4 and 6 to reduce perceived height and improve the transition to surrounding lower-scale development.
- Increased slotting and deeper recesses within the southern façade along Rangers Avenue, breaking down continuous façade lengths and reducing perceived bulk when viewed from the public domain.
- Revision of balcony extents to strengthen vertical articulation and increase perceived separation between the three forms, with upper-level balconies recessed and subtly angled to enhance setbacks and vary façade expression.
- Introduction of landscape planting to upper-level overhangs above four storeys, softening the building envelope and contributing to a more landscaped streetscape presentation. Enhanced material articulation, including:
 - White sandstone and translucent glazing to Level 1–3

- Brick banding and fluted ceramic cladding at Levels 4–6, consistent with the northern building core expression.
- Incorporation of vertical screening elements and expressed columns to counterbalance horizontal balcony lines and reinforce façade rhythm.
- Simplification and pull-back of end wall profiles into the floorplate, improving clarity of form while maintaining visual and acoustic privacy between apartments.

These measures collectively break down horizontal massing, soften the building envelope and reinforce a clear reading of three distinct building forms rather than a single continuous mass.

3.2.4 Car Parking and Basement Extent

In response to DPHI's concerns regarding the basement scale:

- Parking arrangements have been adjusted to accommodate the increased northern setback.
- The reduction in basement extent directly supports increased deep soil and improved landscape outcomes.

Updated parking schedules, allocations (including affordable housing spaces), swept path analysis and capacity for future EV charging provisions are documented in the revised DA drawings and supporting consultant reports.

3.2.5 Affordable Housing and GFA Refinements

The affordable housing component has been refined to address DPHI concerns regarding equity and efficiency:

- The affordable housing lobby at Lower Ground (east) has been reduced in size.
- From an operational perspective, the dedicated lift core is consistent with CHP management models and strata legislation and supports long term affordability by avoiding unnecessary shared costs. Both lift cores are equivalent in design quality and amenity.
- GFA has been reallocated from the lift lobby back into the affordable housing apartments.
- Updated GFA calculations confirm:
 - Consistency with Mosman LEP 2012 definitions.
 - Correct apportionment of shared service areas.

A minimum of 15% of total GFA dedicated to affordable housing, in accordance with the Housing SEPP.

3.2.6 Amenity compliance with the *Apartment Design Guide*

In response to DPHI's comments regarding ventilation and solar access:

- Operable windows have been incorporated into the apartment design of additional apartments to improve natural ventilation and facilitate cross-ventilation.
- The introduction of operable glazing improves solar access and daylight penetration to habitable rooms, complying with the ADG requirements.

Updates are provided in the revised DA drawings and supporting consultant reports.

3.2.7 Landscape Design and Tree Canopy

The landscape design has been refined and strengthened to directly address canopy cover, soil volumes and the long-term health of trees, as demonstrated in the Landscape Master Plan (SSDA_101 to SSDA_206).

Key outcomes of the revised strategy include:

- Provision of new deep soil zones along the northern boundary, including two zones to the north-east and north-west corners of the site, designed to support large-canopy trees at maturity.
- Substantial deep soil planting along the Rangers Avenue frontage, reinforcing the landscaped streetscape character.
- Soil depths, soil volumes and species selection coordinated with the LMR Tree Canopy Guidelines to ensure trees can achieve their intended size and canopy spread.

The revised basement setbacks enable deep soil areas of sufficient width and depth, as illustrated in the Soil Depth and Soil Volume Diagrams (SSDA_202 to SSDA_205). This allows for meaningful tree establishment and long-term viability.

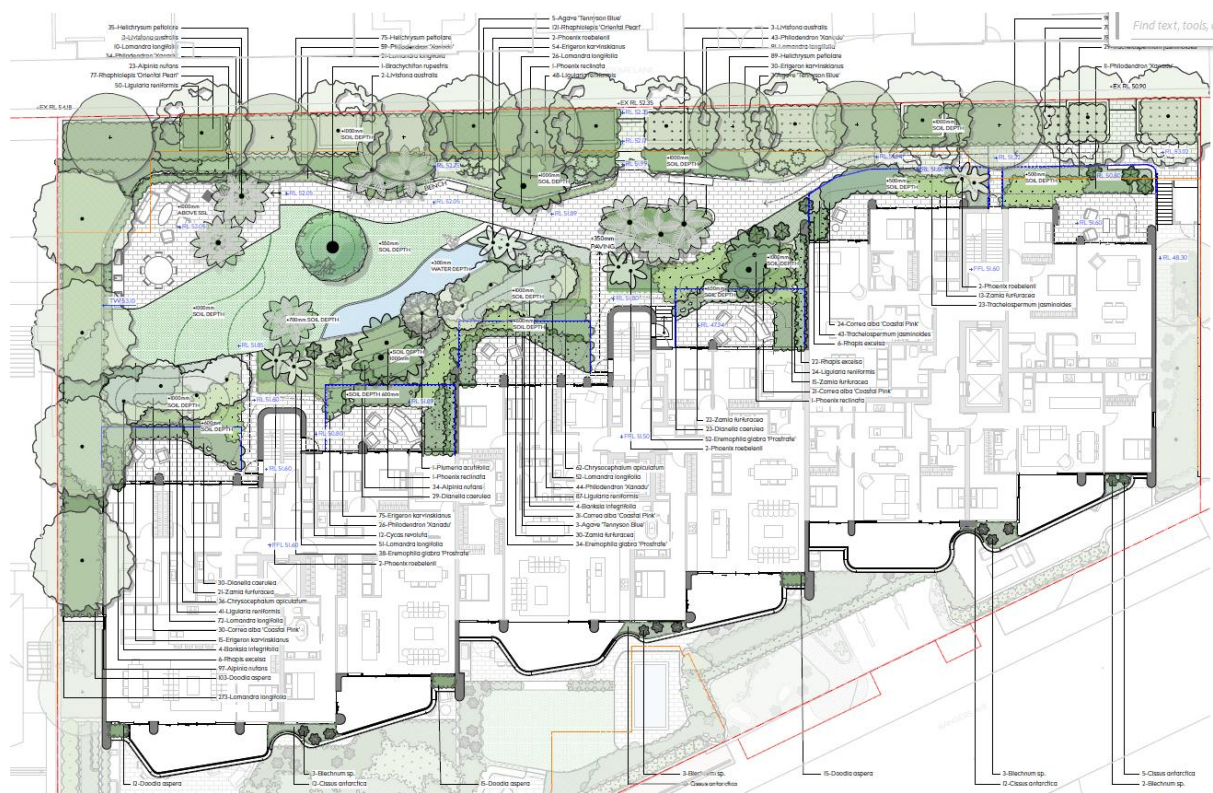


Figure 4 Updated Landscape plan showing substantial tree planting to the north and western boundary at Level 1

The extent of deep soil and landscaped area exceeds the requirements of the Housing SEPP and is consistent with the objectives of the Apartment Design Guide and relevant Council canopy controls.

Collectively, these refinements deliver an improved landscape outcome that increases canopy cover, softens interfaces with adjoining properties and contributes positively to local amenity.

3.3 Comparison with Lodged Scheme

Table 3 below outlines the key differences between the lodged scheme, and the refined proposal accompany this RtS report. Further detail can be found in the appended technical documentation.

Table 5 Design Refinements to Proposed Development Table 6 Design Refinements to Proposed Development

Aspect of the Proposal	Lodged Proposal	RtS Proposal	Change
Land Uses	Residential Flat Building	Residential Flat Building	No Change
Building Height	Ranges in height from 19.95m in the north-west to 25.59m in the south-east.	Ranges in height from 19.5m in the north-west to 24.39m in the south-east	Updated
Number of Storeys	Part 6, part 7 storeys	Part 6, part 7 storeys	No Change
Gross Floor Area	7008m ²	7008m ²	No Change
Communal Open Space	898m ²	898m ²	No change
Market Housing GFA	5,957m ²	5,957m ²	No change
Number of Apartments	44 apartments	44 apartments	No Change
Dwelling Mix	6 X 2 bed 23 X 3 bed 5 X 4 bed	6 x 2 bed 23 x 3 bed 5 x 4 bed	No Change
Affordable Housing GFA	1,051m ²	1,051m ²	No Change
AH Dwelling Mix	10 X 2 bed	10 x 2 bed	No Change
Carparking	80 Residential and 11 visitor parking spaces	77 market, 5 affordable and 9 visitor spaces	No change overall
Bicycle Parking	12 bicycle parking spaces	12 bicycle parking spaces	No change
Carparking	91	91	No change

Level	Amendment
Basement	Revision of the basement car park layout and extent in response to the Department's comments, with a reduced lower-ground basement extent to enable deep soil provision along the northern boundary.
Lower Ground	- Northern lower ground basement wall shifted approximately 3 m to enable deep-soil provision along the northern boundary. - Basement car park layout revised to reflect reduced basement extent and support deep-soil outcomes. - AH lobby area reduced in response to Department comments, with GFA redistributed to upper AH levels. - Porte cochère layout and vehicle swept paths refined in response to Department queries. - Potential future public domain area revised, with final extent and form subject to consultation with and approval by Mosman Council.
Ground	Basement layout revised to reflect reduced extent and enable deep-soil provision along the northern boundary.
Level 01	- Potential for future public-domain initiatives updated from the northern boundary and relocated to Rangers Avenue. - End wall profiles simplified and brought back into the floorplate whilst maintaining visual and acoustic privacy between apartments. - Revised planning of unit 101 due to side wall refinements. - Operable windows incorporated into selected apartments to improve ventilation and solar access, supporting compliance with ADG requirements.
Level 02 – 03	- Balcony extents and articulation revised to enhance vertical articulation and increase perceived separation between the three built forms when viewed from the public domain. - End-wall profiles simplified and recessed within the floorplate while maintaining visual and acoustic privacy between apartments. - Unit 301 planning revised in response to side-wall refinements. - Operable windows incorporated into selected apartments to improve ventilation and solar access, supporting compliance with ADG requirements.
Level 04 – 05	- Additional side setbacks introduced to align with ADG objectives and provide a transition in scale between the proposed building and its surrounding context. - varied articulation through angled and recessed balconies, increasing perceived setbacks relative to lower levels. - End wall profiles simplified and pulled into the floorplate while maintaining visual and acoustic privacy between apartments. - Planning for Units 201 and 301 revised in response to side wall refinements. - Operable windows incorporated into selected apartments to improve ventilation and solar access, supporting compliance with ADG requirements.

Level 06 Penthouse 601 and 602	- Internal courtyard has relocated, with the second living/cinema room updated. - Western wall set back to achieve a 6 m separation from the boundary. - Western planter zone is now non-trafficable, with raised planters and balustrades preventing access. - Planting zone between Penthouses 601 and 602 infilled with a bedroom and bathroom, with the bedroom accessing a private balcony. - Relocated bedroom infill wing has a 2.7 m floor-to-ceiling height, while the remainder of the floor has a reduced 2.9 m floor-to-ceiling height. - Raised planters and balustrades provide privacy and prevent access between Penthouses 601 and 602 - Eastern wall set back 3 m to achieve a 7.8 m separation from the eastern boundary. - Floor plans are reconfigured to minimise height at the south-eastern corner of the site. - Eastern planter zone is now non-trafficable zone with balustrades and a raised planter preventing access.
Roof	- AC condenser units and PV panels reconfigured to enable internal courtyard updates for Penthouses 601 and 602. - Awning heights reduced by 275 mm. - Parapet heights to the western and central rooftop areas reduced to RL 71.500 (a 300 mm reduction). - The new bedroom wing for Penthouses 601 and 602 reduced in scale, with a lower roof and parapet to maintain separation between the penthouses.
North Elevation	- Northern elevation further articulated by stepping the mid and upper levels, creating opportunities for landscaping along the side boundaries. - Levels G-3 provide 3 m side setbacks (6 m shared), increasing to 4.5 m (9 m shared) at Levels 4-5, with the penthouse further recessed at 5.9 m to the west and 7.8 m to the east. - Additional articulation achieved through varied balcony expressions at the upper levels, where balconies are angled and further recessed to differentiate form and increase perceived setbacks relative to the levels below. - Vertical screening elements and expressed columns counterbalance the strong horizontal balcony lines, providing contrasting vertical articulation.
East and West Elevation	- End wall profiles simplified and pulled into the floorplate while maintaining visual and acoustic privacy between apartments. - Apartment layouts for Units 401, 501, 405, 407, 505 and 507 revised in response to the updated setbacks.

Refer to the revised Architectural Plans (**Appendix E**) for further details on the design refinements made since public exhibition.

4 Updated Assessment of Key Impacts

This section provides an updated justification and evaluation of the project as a whole.

4.1 Design Quality

In accordance with Chapter 4 of the Housing SEPP, development consent must not be granted unless the consent authority has considered the quality of the design evaluated in accordance with the design principles for set out in Schedule 9 of the Housing SEPP and the NSW Apartment Design Guide.

The proposed development has been considered against Schedule 9 and the Apartment Design Guide, as detailed in the Design Verification Statement (**Appendix D**), and a summary of the proposal is provided below:

Theme	Response
1. Context and Neighbourhood Character	▪ Site at 11–23 Rangers Avenue benefits from dual frontage, with a southern aspect to Rangers Avenue and northern boundary to Bloxsome Lane ▪ Located between the Mosman and Cremorne Town centre and identified as a potential development opportunity under the NSW Low and Mid Rise Housing Policy ▪ Surrounded by the suburban grid from the Holt Estate Heritage Conservation Area to the north and the Landscape Gully & Rock Formations to the south. ▪ Apartment buildings approximately 6–10 storeys in height surrounding the site includes 36A Park Avenue, 14, 16, 26 Cranbrook Street, 139 Avenue Road and 182 Raglan Street.
2. Built Form and Scale	▪ Revised setbacks on the proposal aligns with the Apartment Design Guide. ▪ Upper level stepping of 4.5m on Levels 4–5 and 5.9m to the west and 7.9m to the east provides articulation of the building mass. ▪ Reduction in overall building height ▪ Balcony recesses and articulation on the southern elevation as increased and made legible from the street, reinforcing the perception of the proposal as three distinct masses rather than a single continuous form.
3. Density	▪ The proposal achieves a suitable density under the Low and Mid Rise Housing Policy and Affordable Housing bonus. ▪ The site located in close proximity to the Cremorne Town Centre which offers the residents with a wide range of services.

4. Sustainability	▪ Apartments have been designed as dual-fronted dwellings to optimise solar access and daylight performance ▪ Cross ventilation is achieved in the proposal through the north-south ventilation for over 70% of the units ▪ Balconies are provided along the northern façade to incorporate solar shading while allowing winter sun to penetrate into the living space. ▪ Sandstone is procured from local quarries to connect the project to its place. ▪ Photovoltaic system will be provided on the roof, with landscaping including endemic species
5. Landscape	▪ Proposal provides adequate Landscaping areas, tree canopy and deep soil in accordance with the relevant guidelines and requirements. Refer to the updated Landscape Plans by Wyer & Co (Appendix J)
6. Amenity	▪ 75% of the proposed units will receive at least 2 hours of solar access between 9am and 3pm ▪ The proposal achieves sufficient building separation from Bloxsome Lane with building separation ranging from 8.7 – 24m. A line of trees with deep soil planting is also proposed along the Bloxsome Lane site boundary to reduce privacy and overlooking impacts on Bloxsome Lane.
7. Safety	▪ The proposal addresses safety of pedestrians along Rangers Avenue through providing a Porte Cochere for seamless entrance, enhancing pedestrian safety along Rangers Avenue. ▪ Additionally, the design of the Porte Cochere has been amended to follow the pedestrian sight triangle as part of this amended submission to further enhance pedestrian safety.
8. Housing diversity and social interaction	▪ The proposal includes a range of 2 to 4 bedroom apartments and Affordable Housing apartments which represents housing diversity to enhance social interaction. ▪ Communal open space is also provided on the northern side of the site to provide ample sunlight and landscaping.
9. Aesthetics	▪ The proposal incorporates a defined sandstone base aligning with the materiality of buildings located within the Holt Conservation Area. ▪ Brickwork to add texture and visual interest, aligned with the character of Mosman. ▪ Landscaping is proposed on the northern side of the site with inspiration from the natural gully on the site and to soften the overall built form.

4.2 Apartment Design Guide Compliance

A comprehensive ADG Assessment with supporting schedules and diagrams has been provided at **Appendix F** of this RtS. The proposal continues to maintain a high degree of compliance with the apartment design guide.

In this regard, the proposal:

- Complies with solar access requirements, with 75% of apartments receiving greater than 70% solar access
- Complies with cross ventilation requirements, with 77% of apartments being naturally cross ventilated
- Complies with apartment sizes and balcony sizes and private open space with a minimum 12m² provided for 3+ bedroom and 10m² for 2+ bedroom apartments.
- Complies with storage requirements, with at least 50% located within the apartment and the remainder in the basement. All apartments comply with the minimum dedicated storage volumes set out in the ADG.
- Complies with communal open space and deep soil requirements

In regard to building separation and setbacks, the ADG requires setbacks between 3m and 6m at Level G-4 and 4.5m – 9m at Level 5-8, depending on whether the façade is habitable or non-habitable.

As noted in section 3.2.2 Side Setbacks, the proposal has been amended to have:

- 3m side setbacks from Level G – 3
- 4.5m side setbacks at Level 4-5
- Further recession of the upper level, with setbacks of 6 m to the west and 7.9 m to the east, exceeding ADG non-habitable requirements.

The non-habitable façade to the side boundaries is considered a superior response as it protects privacy and overlooking across side boundaries (comparative to a 6m setback with habitable balconies overlooking).

Landscaping and non-trafficable areas have been provided to the uppermost level on the side boundaries to further mitigate potential overlooking impacts.

The rear setback ranges from approximately 8m to 24m which on average significantly exceeds the minimum ADG setbacks and separation distance. In addition to this, a number of privacy mitigation measures have been introduced to further mitigate privacy and direct overlooking.

4.3 Privacy Impacts

The northern interface has been designed specifically to respond to the C4 Environmental Living and the *Holt Estate Heritage Conservation Area* where landscape character, privacy and heritage values are key considerations.

The proposal includes a range of privacy measures

- A stepped and modulated northern façade
- Rear setbacks ranging from approximately 8 m to 24 m, resulting in an average setback of around 15 m and consistent with the intent of ADG.
- The balconies have been designed and curated to be of different shapes and sizes to provide for visual interest and as a measure to avoid direct overlooking.

- The northern façade comprises predominantly secondary balconies and bedrooms

These changes reduce perceived bulk, improve visual separation, enhance privacy outcomes and create opportunities for supplementary planting within setback zones. Predominantly non-habitable facades with limited and obscured openings further mitigate direct overlooking and acoustic impacts.

Privacy impacts to Bloxsome Lane are further mitigated through a combination of level changes, boundary fencing, deep soil planting and mature tree canopy along the northern edge.

The extent of articulation and the stepped setback is illustrated in **Figure 5** and **Figure 6** below:

Figure 5 Setback Diagram along separate buildings

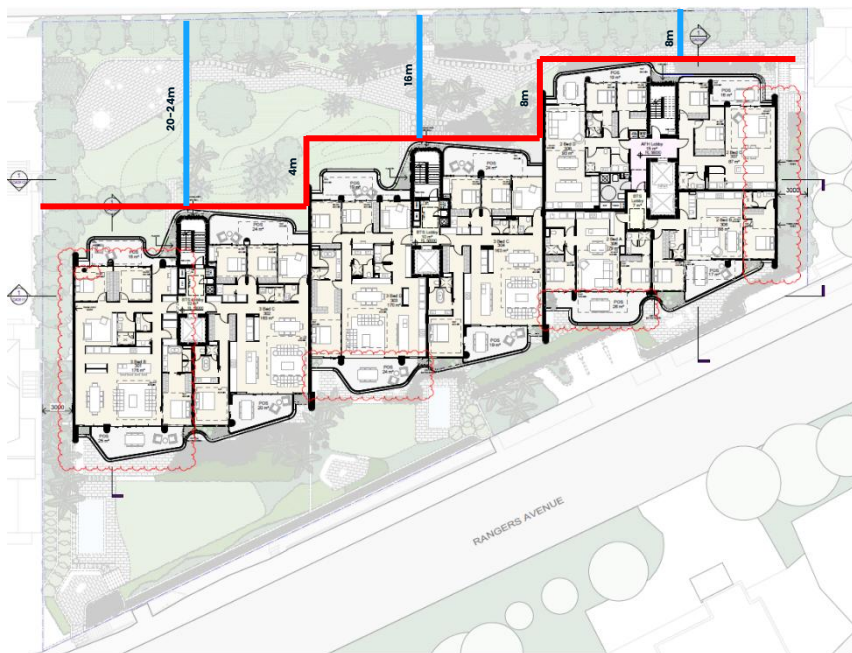
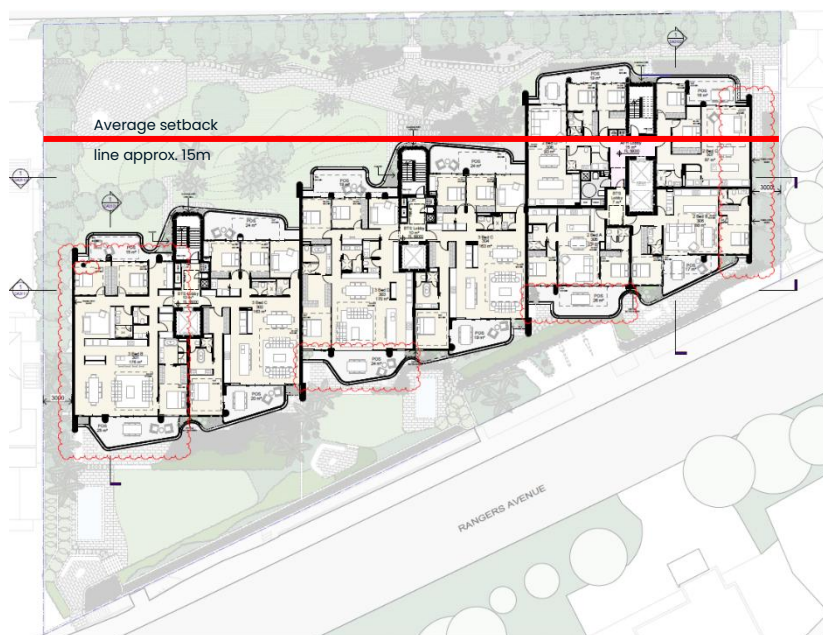


Figure 6 Average site setback diagram



4.4 Visual Impact Assessment

The updated Visual Impact Assessment (VIA) for the revised proposal assesses private view impacts upon nearby dwellings.

Access was provided to four of the closest and potentially most affected properties to the north of the site along Holt Avenue. The VIA concludes that view loss will occur, with three dwellings assessed as severe and one as moderate under the Tenacity qualitative rating scale.

In all cases, the impacts result from a fully compliant and permissible built form; having regard to the site's location, topography and the relative height and alignment of surrounding dwellings, the VIA concludes that further design refinement would not meaningfully reduce view impacts without unreasonably constraining the site's reasonable development potential. The extent of view loss is therefore contemplated by the Housing SEPP, including its bonus provisions.

Figure 7 View Impact Assessment photomontage from nearby properties on Holt Avenue



Above: Proposed View from 16 Holt Avenue



Above: Proposed view from 18 Holt Avenue



Above: Proposed view 26 Holt Avenue



Above: Proposed view 28 Holt Avenue

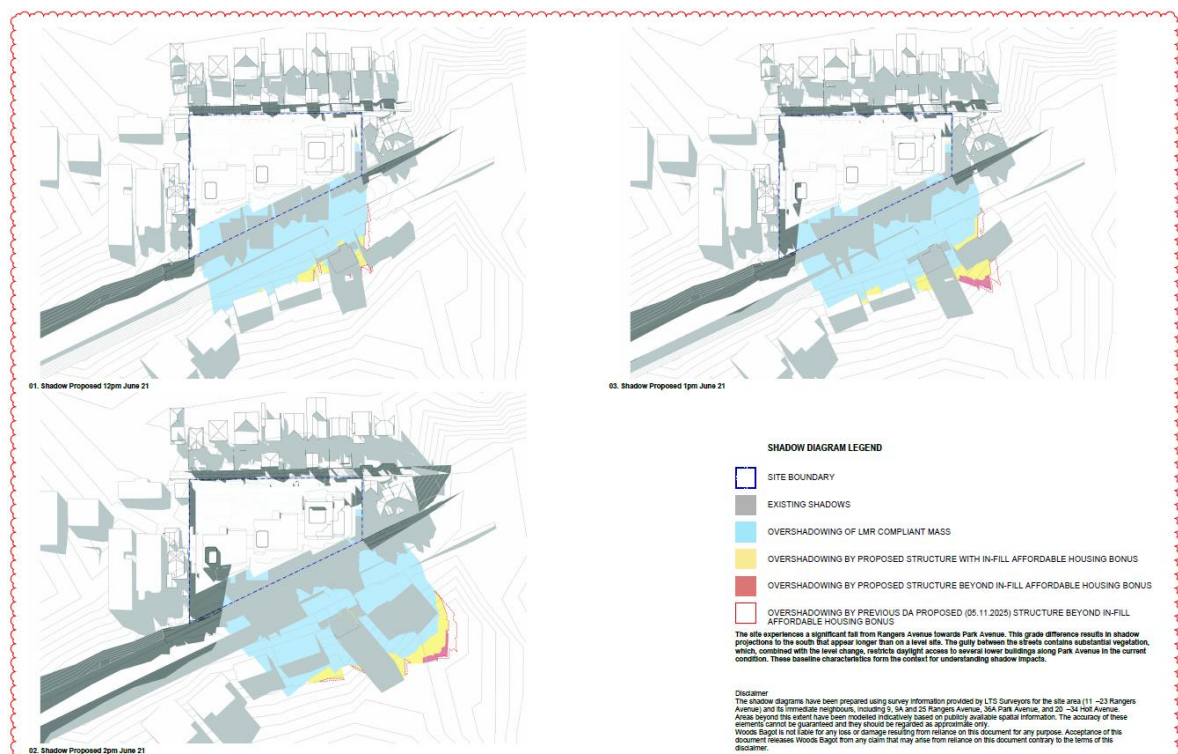
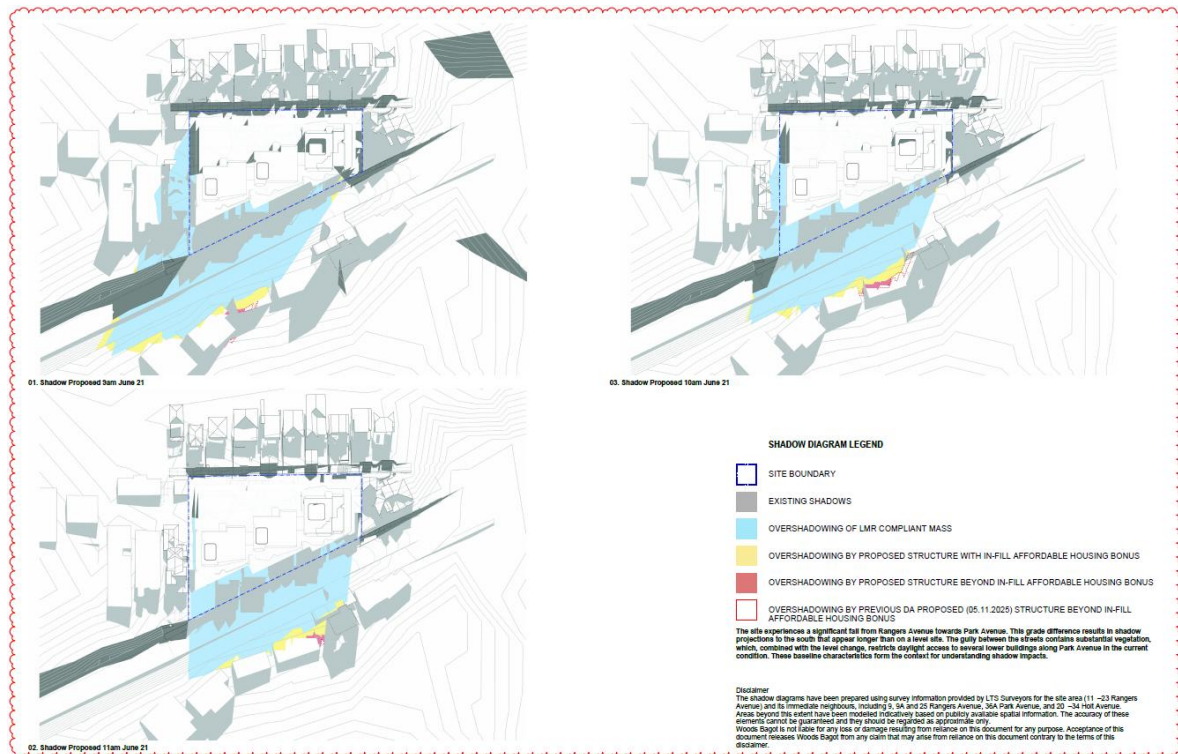
Source: *Urbis Visual Impact Assessment (2026)*

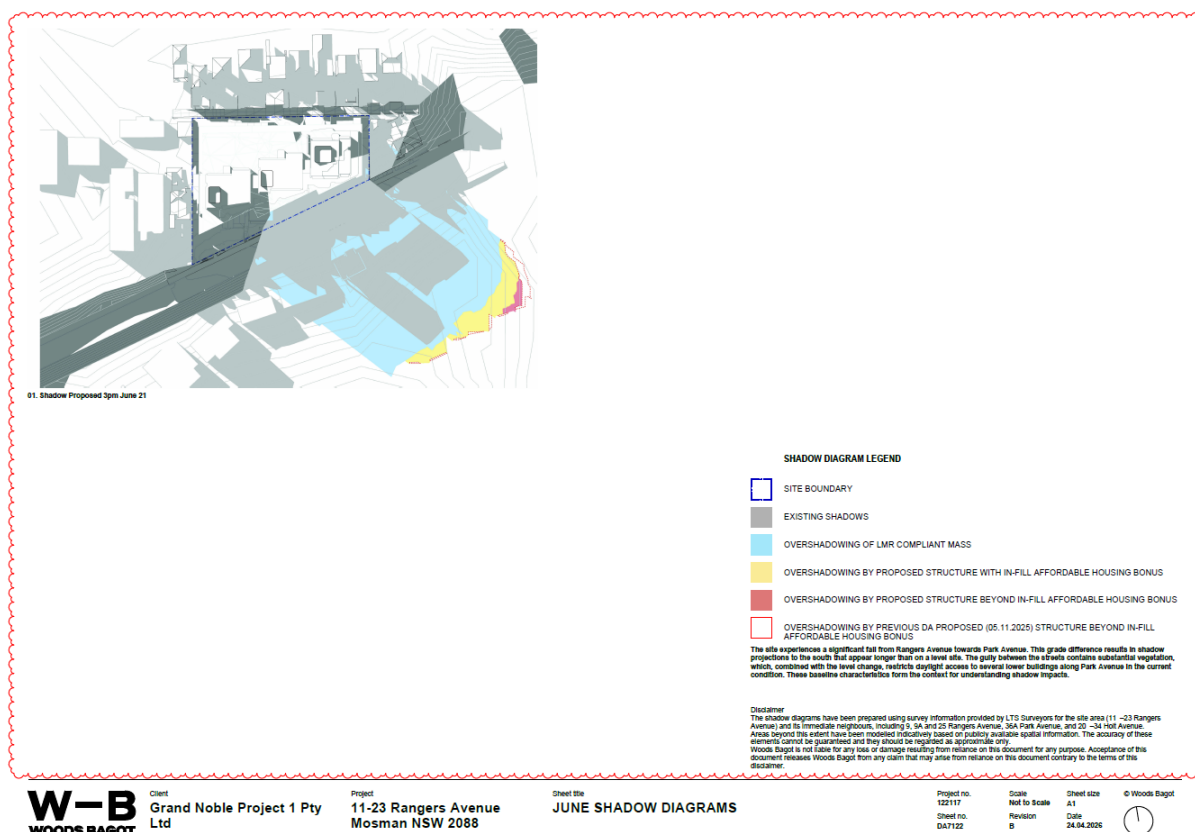
4.5 Overshadowing

The revised Shadow Diagrams depicting the impact of the proposal from 9am to 3pm on June 21 has been provided by Woods Bagot based on the updated proposal, as depicting below in **Figure 8** below. Specifically, the updated diagrams highlight that the proposed overshadowing impacts to the properties along Park Avenue is minimal. The only property that will potentially be affected by overshadowing will be the windows to a bathroom and kitchen at 36A Park Avenue.

As illustrated in the below diagrams, the increased upper level setbacks to the east result in a further reduction to the extent of overshadowing. There is only a minor slither of additional overshadowing as a result of the proposed height exceedance. Given that this part of the shadow falls beyond the dwellings, the proposed non-compliance does not result in any discernible loss of solar to those properties to the south.

Figure 8 Updated Shadow Diagrams





4.6 Landscaping

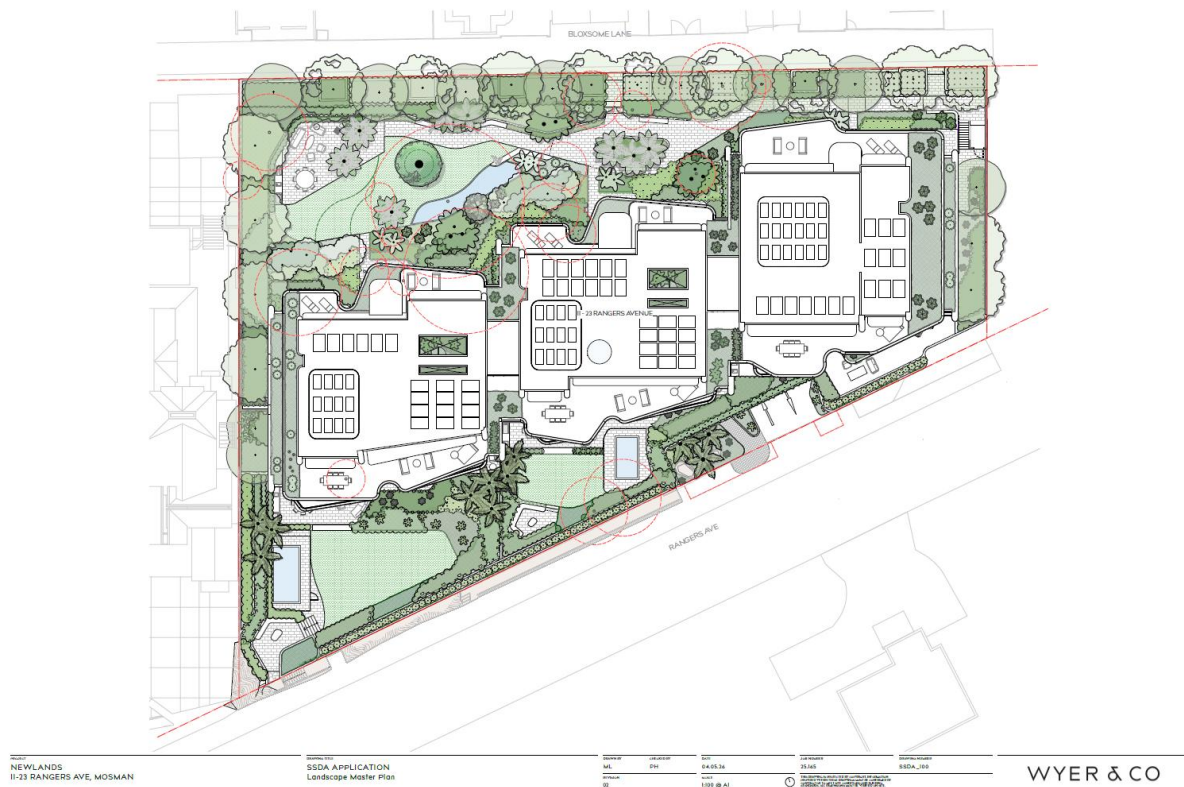
The proposed landscape plans have been updated to reflect latest refinements to the project in response to the RtS, as well as comments raised in by the DPHI in their Key Issues letter and Mosman Council in their objection letter. These are available at **Appendix M**. The updated landscape design across the site achieves the relevant compliance requirements under the Housing SEPP, ADG and the Tree Canopy Guide for Low and Mid Rise Housing as detail in the below table.

Table 7 Landscape Compliance Requirements

Item	Guideline / Legislation	Requirements	Proposed	Satisfies
Landscaped Area	Housing SEPP Clause 19 – Non-Discretionary Development Standards	Minimum 30% of site area	57.2% of site area (2057m ²)	✓
Tree Canopy Calculations	Tree Canopy Guide for Low and Mid Rise Housing Table 7 for site area >1,500m ²	Minimum 20% of site area	22% of site area (790.4m ²)	✓
Deep Soil Calculations	Apartment Design Guide Objective 3E-1	Minimum Dimensions 6m, Minimum Deep Soil Zone 7%	8.1% of site area (292m ²)	✓
	Tree Canopy Guide for Low and Mid Rise Housing Table 7 for site area > 1,500m ²	Minimum Dimensions 3m, Minimum Deep Soil Zone 15%	16.2% of site area (584m ²)	

As extracted in the updated Landscaped Plans in **Figure 9** below, the proposal development is heavily landscaped throughout the full site to enhance greenery throughout the site and reduce the impact of the proposal on the surrounding properties. Specifically, the amount of deep soil planting has now significantly increased when compared to the previously submitted proposal, including a deep soil zone of approximately 3m along the northern boundary towards Bloxsome Lane. A line of trees will also be planted along the east, north and western boundaries of the site provide shielding towards the neighbouring properties.

Figure 9 Updated Landscape Plans



Source: WYER & Co.

4.7 Traffic and Parking

JMT has provided an additional letter that responds to the traffic items raised by DPHI and Mosman Council during the exhibition period (**Appendix G**).

Parking Rates

DPHI has raised comments regarding the proposed parking provisions being significantly above the rate required by Section 19 of the Housing SEPP. It should be noted that the parking rates in the Housing SEPP has been relocated from Section (2)(e) and (f) to Section (22A) of the in the 24/04/2026 update to the Housing SEPP. Nevertheless, the proposal continues to satisfy the parking rate. The parking rates have been provided in accordance with the Mosman DCP which is more appropriate for the development and will reduce reliance on on-street parking, a key concerned raised by the community in their objections.

The proposal satisfies the parking requirements in accordance with the Housing SEPP while providing adequate parking for the occupants including downsizers, ageing owner-occupiers and

young families. The parking allocation has also been confirmed based on the information from the Traffic letter which states that that 77 market, 5 affordable and 9 visitor spaces will be provided.

Car Parking Design

Council and DPHI have raised comment and request for additional information regarding the design of the carpark and additional swept path diagrams to ensure compliance with the relevant regulations and standards. In response, the applicant has provided a Swept Path analysis in Appendix A of the Traffic report confirming that a B99 vehicle can access all parking areas without conflict. The driveway width and design have also been reduced to comply with AS2890.1 to ensure that vehicles can enter and exit without impacting on vehicle movements at Rangers Avenue during enter and exit. Additionally, the amended design addresses all Council concerns regarding potential collision hazards and line-marking. The has also updated the car parking layout to provide a 1m aisle extension for the blind aisle on the Lower Ground Floor level.

4.8 Additional Impact Assessments

Additional assessments and advice have been prepared to respond to the issues raised within the submissions. These include:

- Geotechnical issues
- Waste Management
- Flooding

The findings and recommendations of the additional impact assessments are discussed in detail in the RtS Response Table at **Appendix A**.

5 Updated Project Justification

This section provides an updated justification and evaluation of the project as a whole, having regard to issues raised during the public exhibition of the Environmental Impact Statement (EIS) and the refined assessment material prepared in response to submissions.

An updated table of proposed mitigation measures is provided at **Appendix B** which has regard to the economic, environmental and social impacts of the proposal.

5.1 Project design

The proposed development at 11–23 Rangers Avenue has been refined through the Response to Submissions process to address matters raised during public exhibition, while continuing to deliver a residential flat building consistent with the Low and Mid-Rise Housing and In-fill Affordable Housing objectives of the Housing SEPP.

The site's location within walking distance of Cremorne Town Centre and close to frequent public transport provides a strategic basis for accommodating additional height and density in accordance with State planning policy. The proposed built form responds to this context while maintaining a sensitive relationship with adjoining residential areas, Bloxsome Lane and the Holt Estate Heritage Conservation Area.

The built form has been amended to further articulate building mass and reduce perceived bulk. These amendments include additional stepping of upper levels and the penthouse, increased side setbacks, and enhanced balcony recesses and articulation along the southern elevation. Collectively, these measures reduce continuous façade lengths, improve legibility from Rangers Avenue and reinforce the perception of three distinct built form elements rather than a single continuous building.

The additional height enabled by the In-fill Affordable Housing provisions is predominantly expressed toward the southern and south-eastern portion of the site, where the land falls away toward Rangers Avenue and Mosman Bay. This approach minimises impacts on lower-scale residential properties to the north. Increased setbacks to Bloxsome Lane, recessed upper levels, solid balcony upstands and considered apartment planning further manage potential impacts relating to overshadowing, visual privacy, views and streetscape character.

Additional deep soil area has been incorporated as part of the updated proposal, ensuring compliance with deep soil, landscaping and tree canopy requirements and strengthening the landscape interface with surrounding properties.

The proposal utilises the In-fill Affordable Housing and Low and Mid-Rise Housing planning pathways to enable increased density and deliver 10 affordable housing apartments, secured for a minimum of 15 years and managed by a registered community housing provider. This outcome delivers a clear public benefit in a high-amenity, high-cost housing market by providing housing opportunities for low to moderate income households in close proximity to employment, services, public transport and open space.

On this basis, the refined proposal represents an appropriate design response for the site and is suitable for approval, subject to appropriate conditions of consent.

5.2 Strategic Planning Consistency

The proposed development remains consistent with the relevant State, district and local strategic plans and policies, including:

- **National Housing Accord and NSW Housing Strategy Housing 2041**, through the delivery of additional housing supply, including affordable housing, in a well-located urban area.

- The Greater Sydney Region Plan – A Metropolis of Three Cities (**GSRP**) and North District Plan (**District Plan**), by locating housing within walking distance of Cremorne Town Centre and close to frequent public transport, supporting access to jobs, services and centres.
- Mosman Local Strategic Planning Statement (**LSPS**) and Mosman Local Housing Strategy
- Low and Mid-Rise Housing and In-fill Affordable Housing reforms, with the proposal reflecting the desired future character anticipated under the Housing SEPP.

We acknowledge several existing strategic planning documents pre-date recent State and Federal policy reforms addressing housing supply and affordability. The proposal has therefore been assessed in the context of the current statutory framework, which supports medium-density development on accessible sites within walking distance of centres, including Cremorne Town Centre.

5.3 Statutory Planning Consistency

The proposal satisfies the relevant statutory planning provisions that apply to the site. In summary:

- The application has been prepared in accordance with the Secretary's Environmental Assessment Requirements (SEARs) issued under the EP&A Regulation. A summary response to the SEARs is provided at **Appendix A**.
- The proposal has been assessed having regard to the principles of ecologically sustainable development, as required by section 193 of the EP&A Regulation. This assessment is included in Section 6.4 of the EIS.
- Relevant matters under the Biodiversity Conservation Act 2016 have been considered, and the SSDA is supported by a Biodiversity Development Assessment Report (BDAR) waiver.
- The proposed development has been assessed in accordance with the State Environmental Planning Policy (Resilience and Hazards) 2021 and is suitable for the proposed land use. The site is not affected by contamination that would preclude the development.
- The SSD pathway has been correctly applied under the Planning Systems SEPP, as the proposal meets the criteria for State Significant Development based on the quantum of affordable housing proposed and the estimated development cost.
- The proposal is permissible within the R3 Medium Density Residential zone and is generally consistent with the provisions of the Mosman LEP 2012 and the relevant development standards of the Housing SEPP.

Accordingly, the proposal is consistent with the applicable statutory planning framework.

5.4 Community Views

Community and stakeholder engagement has been undertaken by the Applicant and Urbis in preparation of the SSDA, including consultation with:

- Surrounding landowners and residents; and
- Government, agency, utility providers and relevant stakeholders.

In accordance with the EPA Regulation, the EIS was placed on formal public exhibition for 14 days between 4 December 2025 and 17 December 2025. This Response to Submissions addresses the issues raised during exhibition and identifies where updates and clarifications have been made, supported by technical documentation where relevant.

5.5 Likely Impacts of the Proposal

The refined proposal has been assessed considering the potential environmental, economic and social impacts. The assessment of impacts carried out in Section 4 confirms a satisfactory outcome in relation to:

- Design Quality
- Apartment Design Guide Compliance
- Privacy Impacts
- Visual Impact Assessment
- Overshadowing
- Landscaping
- Traffic and Parking
- Geotechnical
- Waste
- Flooding

No new or additional adverse impacts have been identified as a result of the amended proposal.

All other impacts remain as assessed in the EIS, and the previously identified mitigation measures continue to apply. Potential impacts can be avoided, minimised or managed through the measures detailed in **Appendix A** and summarised in RtS **Appendix C**.

5.6 Suitability of the site

The site is suitable for the proposed development for the following reasons:

- Residential flat buildings are permissible within the R3 Medium Density Residential zone under the Mosman LEP 2012.
- The site is well located within an established urban area and is identified as suitable for increased density under the Housing SEPP.
- The proposal generally aligns with the applicable statutory controls, including height and floor space ratio, having regard to the Housing SEPP provisions.
- The site is not affected by constraints that cannot be appropriately managed through design or mitigation measures.
- The scale and character of the development are compatible with the surrounding landscape and heritage context and respond to the emerging future built form anticipated under the current planning framework.
- The proposal delivers market and affordable housing in an accessible location, consistent with the objectives of the NSW Housing Strategy.
- The site is located within 400 metres of a bus stop, with the 230 bus route providing regular services throughout the week, supporting access to public transport.

5.7 Public Interest

The proposed development is considered to be in the public interest for the following reasons:

- The proposal is consistent with relevant State and local strategic planning objectives and substantially complies with the applicable planning controls. It delivers additional housing, including affordable housing, in a location identified for increased density under State planning policy.
- The proposal contributes to the NSW Government's objective of increasing housing supply by delivering 10 affordable apartments and 34 market apartments in an area with good access to local services and public transport.

- The assessment demonstrates that the proposal will not result in any significant or unacceptable environmental, social or economic impacts. Where impacts have been identified, appropriate mitigation measures are proposed.

Having regard to all relevant matters, the proposal is appropriate for the site and approval is recommended, subject to appropriate conditions of consent.

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