

Appendix A – Summary Response Table

Table 1 Summary of Issues

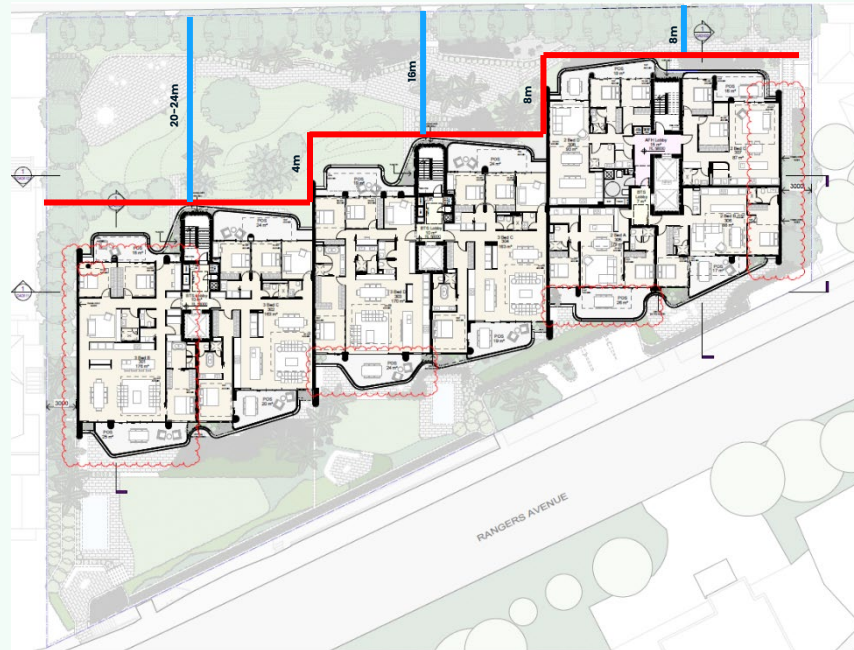
Summary of Issue Raised	Response	Supporting Document
NSW Department of Planning, Housing and Infrastructure 10 items		
<u>Building Separation:</u> 1. The Apartment Design Guide (ADG) provides design criteria for building separation to ensure residential development contributes to the amenity and character of an area provides appropriate massing and spaces between buildings. It also assists in providing residential amenity including visual and acoustic privacy, natural ventilation, sunlight access and outlook, and area for open space, landscaping and deep soil. The building maintains side setbacks of 3 m up to Level 5 (west) and to Level5/6 (east), which are less than the Apartment Design Guide (ADG) design criteria (6 m up to four storeys and 9 m for 5 to 8 storeys for habitable rooms and 6 m for non-habitable rooms). The Department acknowledges that the proposal has sought to provide blank walls where possible. Notwithstanding, given the six-storey scale of the development, the limited side setbacks do not allow sufficient space between the neighbouring	The plans have been revised to increase the setbacks on the eastern and western sides of the site. On Levels 4 and 5, the setbacks have been increased from 3 metres to 4.5 metres, while Level 6 now provides setbacks of 7.8 metres and 6 metres. These amendments to the plan ensure compliance with the ADG separation from neighbouring buildings on both sides of the site. Additionally, the provision of blank walls in the eastern and western sides of the property with obscure / frosted windows on both sides help reduce the impacts on privacy towards the eastern and western sides of the site. This directly responds to concerns around privacy and overlooking and is a preferred outcome compared to 6m setbacks with habitable facades and balconies overlooking the side boundaries. Supplementary planting has also been provided along the setback zone at Level 4 and the upper level, providing a landscaped buffer to create visual separation to other neighbouring structures. The footprint of the basement carpark design has also been reduced to increase the northern setback, along Bloxsome Lane. The basement is now setback 3m, with two corner areas setback 6m allowing for deep soil planting along the full extent of Bloxsome Lane.	RTS Appendix C, D and E

buildings to mitigate the change in scale and also reduce opportunities for landscaping and deep soil as well as increase view loss impacts (see point 5 below). It also compromises the building setbacks for future developments on both sides, which can only propose blank walls to maintain appropriate building separation in the future. The Department therefore requests that you increase the side setbacks and building separation to neighbouring properties to the east and west, to contribute to the desired future character of the area, provide opportunities for additional landscaping and reduce the reliance on blank walls and highlight windows to mitigate impacts. <u>Basement Setbacks:</u> 2. The proposed basement has zero setbacks to the rear and side boundaries, resulting in compromised deep soil zones and limited planting within the setbacks. The Department requests that you explore options to increase basement setbacks (especially to the rear) by rationalising the basement footprint, which can be achieved by reducing the amount of car parking (see point 7 below), amending the internal layouts or other design changes, to increase the setbacks to allow more deep soil planting to contribute to the landscaped character of the area.		
<u>Built Form & Character:</u>	The northern façade is highly articulated into three separate modules. The base build has recesses of 4m and 8m between the blocks, as shown below.	RTS Appendix C, D, E and F

3. The proposed building lacks facade articulation and presents as a singular and dominant mass that will be incongruous with the character of the surrounding residential context, in particular to the north, where the site adjoins Holt Estate Heritage Conservation Area (not within the Low and Mid-rise (LMR) housing area). The Department is concerned that no transition in scale is provided to the surrounding lower scaled developments and heritage significant areas to the north. The lower ground level, while not being counted, presents as an additional storey to the public domain and contributes to perceived height and scale. Cumulatively, the proposal does not address the desired local character of the area as required by Chapter 4 of the State Environmental Planning policy (Housing) 2021 (Housing SEPP).

Consequently, you should consider options to further articulate the building facades fronting Rangers Avenue and Bloxsome Lane to reduce the perceived bulk and scale of the buildings. This may include opportunities for:

- reducing continuous façade lengths, separating envelopes where possible
- incorporating recesses that can be visually perceived from the public domain
- adding further façade articulation, a variety of materiality and architectural expression to break down the strong horizontality



In addition to the stepping of the base building, 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 design incorporates landscaping between the balconies, which wraps around the encased service stair. At the upper level, the glazing line of the façade is further recessed, providing for reduced building form.

Comparative to a standard block form, the proposal provides for a superior urban design response, with deep recesses, variations in setbacks and variation in balcony orientation, form, shapes and sizes. The combination of measures used in addition to the materiality palette provides a skilful urban design response to the north.

providing a more sympathetic transition to surrounding lower scaled development, in particular to the north, through height differentiation and additional upper-level setbacks.	In regard to the southern façade, the design has been further articulated to accentuate the vertical proportions of the three distinct masses. This has been achieved by: - Incorporating deeper and wider recesses between the blocks - Decreasing balcony sizes to increase recesses - Additional articulation through varied balcony expressions at the upper level - Vertical screening elements and expressed columns	
<u>Heritage Impacts:</u> 4. Provide detailed analysis to demonstrate how built form impacts to outlook, sky access and overall amenity from the adjoining heritage conservation area will be mitigated. This includes: - additional site and building sections as well as contextual elevations showing adjacent development and surrounding context to clarify scale, height and interface conditions - view analysis illustrating impacts to outlook, sky, and views (see point 5 below).	Refer to the amended Heritage Impact Statement in RTS Appendix O The sloping topography limits direct line of sight, ensuring that the development does not dominate views from the conservation area. The letter also provides an assessment with regards to impacts on outlook, sky and views as demonstrated below: Outlook: The amended design has increased setbacks to the eastern and western boundaries and reduced visual proximity when viewed from the HCA. Street trees and a new deep soil zone providing a proposed line of trees along the northern boundary of the site provides a filtered separation from the proposed view elements. The proposal is also oriented to have a significant setback from the rear side of adjacent properties ranging from 7.8m to 30.9m, confirming that the outlook impacts from rear yards of properties along Holt Avenue is minimised. The stepping of the built form creates substantial breathing space between the site and the HCA. Sky Access: Given the proposed footprint area is small compared to the size of the Conservation Areas to the north, impacts on sky access to properties within the area is minimal. Substantial building separation further increases sky access and exceeds the separation that could otherwise occur under standard ADG setback controls. Views: The updated Letter to Heritage Impact Statement confirms that any view loss is confined a small number of properties, approximately six	RTS Appendix O

	immediate northern neighbours along Holt Avenue, to long-distance views towards part of the Sydney CBD.	
<u>View Impact Assessment:</u> 5. The submitted Visual and View Impact Assessment addresses majority of the critical viewpoints. However, Environmental impact Statement (EIS) notes properties along Holt Avenue incorrectly as Rangers Avenue and the view loss assessment does not provide adequate qualitative analysis of the properties along this street, especially from living areas. Consequently, the Department requests you to provide the following additional information, to allow for a complete assessment of view loss impacts from private and public properties: ▪ include the four-step assessment in accordance with the Planning principle for View as expressed in <i>Tenacity Consulting v Warringah Council</i> (2004) NSWLEC 140 for each of the assessed properties ▪ include additional view assessments to determine the impact on each property located at the rear of the development along Holt Avenue that may experience noticeable detrimental view impacts due to the proposal Note that additional site inspections would be needed to determine the view loss extent.	The VIA has been updated to provide more detailed analysis of Holt Avenue properties. The assessment applies the four-step Tenacity view assessment method and includes analysis of public domain views from Mosman Bay and the Cremorne Point Walk.	RTS Appendix K

- consider the orientation of the affected properties and view corridors to iconic / water views - provide view impact analysis around Mosman Bay including the Cremorne Point Walk to demonstrate how impacts have been mitigated from public domain and public walkways. 6. Additionally, your response should also address any specific concerns regarding view loss raised in submissions to the EIS.		
<u>Parking:</u> 7. The proposal includes car parking provisions significantly above the requirements of Section 19 of Housing SEPP. This excess car parking has led to a substantial increase in the basement footprint, which is not supported (see point 2 above). The Department requires you to reduce car parking on site and comply with the minimum requirements of the Housing SEPP, given the site is located in a highly accessible area. 8. Provide a breakdown of the proposed car space allocations, including confirmation of car parking spaces that will be allocated to the affordable housing apartments. 9. Consider the provision of EV charging stations to support alternative modes of transport. 10. Provide additional information and swept paths for the following:	The Housing SEPP establishes minimum car parking rates for residential development. The proposal achieves the minimum requirements, with a total of 91 spaces, comprising 77 market unit spaces, 5 affordable unit spaces and 9 visitor spaces. This level of provision satisfies the former Section 19(2)(e) and (f), and the current Section 22A of the Housing SEPP, and is therefore appropriate having regard to the scale of development, its location and local context. Additionally, in accordance with Section 4.15 (2)(a) of the EP&A Act, the consent authority is not entitled to take those standards into further consideration in determining the Development Application. Accordingly, the proposed car parking provision is compliant with the relevant statutory framework and warrants no further assessment or adjustment by the consent authority. In accordance with the mandatory requirements of the NCC, all residential parking spaces will be provided with enabling infrastructure to facilitate the future installation of electric vehicle charging, should residents elect to install charging equipment. Updated vehicle access and swept path arrangements are provided in Appendix A of the Traffic Report which demonstrates and confirms that the proposed parking layout operates safely and efficiently.	RTS Appendix J

• carparking spaces in the diagram • swept paths showing that columns within the porte cochere will not compromise vehicle movements in these areas.		
<u>Landscaping & Deep Soil</u> 11. Recalculate the deep soil provisions (section 3E) consistent with the ADG definition, excluding (as a minimum): a. built and hard paved areas b. landscaped areas less than 6 m in width. 12. Provide an amended landscape area compliance plan to demonstrate that 30% of the site is landscaped as required by section 19(b) of the Housing SEPP, given that parts of the landscaped areas are compromised by hard stand structures and retaining walls. 13. Clarify how the proposal meets the Tree Canopy Guide for the LMR housing guidelines, noting that large, mature trees of good health in deep soil zones are proposed to be removed and replaced with smaller trees. 14. Provide additional landscape plans indicating the planting areas, their soil depth and volumes and the soil volume/depth relationship to proposed species and plant sizes to ensure ongoing viability of proposed landscaping. 15. Explore opportunities to provide mature tree planting along Rangers Avenue to breakup visual	The updated Landscape Plans have been provided by Wyer & Co in Appendix M, in response to the DPHI requirements for Landscaping and Deep Soil. <u>11. Deep Soil Provision (Definition)</u> Deep soil provisions have been re-calculated as per the ADG definition, excluding built and hard paved areas and landscaped areas less than 6m in width. The proposed design has also been revised to increase the amount of Deep Soil Area within the site. The deep soil area with 6m minimum horizontal dimension is 292m² which is 8.1% of site area and greater than the 7% required in accordance with the with the ADG, confirming that the proposal satisfies the requirements. <u>12. Landscape Area Compliance</u> The proposal will achieve 2057m² of landscaped area (57.2% of site area) which is greater than 1078.2m² (30% requirement) according to the section 19(b) of the Housing SEPP. Therefore, the proposal complies. <u>13. Tree Canopy Guide for LMR Housing Guidelines</u> The proposal meets the Tree Canopy Guide from LMR Housing Guidelines. The site area is 3,594m² and the total tree canopy achieved is 790.4m², which is 22% of the site area, exceeding the 20% minimum tree canopy requirement on the Tree Canopy guide.	RTS Appendix M

length and mass as perceived from the south and Mosman Bay.

Proposed Deep Soil Area with 3M minimum horizontal dimension is 584², which is 16.2% of the site area, greater than the 15% required in the Tree Canopy Guide.

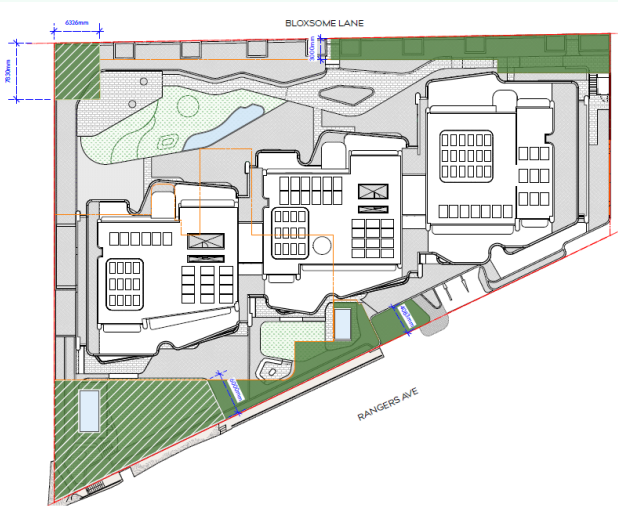
According to the Tree Planting Rate, 14 medium trees and 7 large trees are required in the Deep Soil Area. This clause is satisfied as 15 medium trees are proposed within the deep soil area, which is greater than the 14 medium trees required.

14. Planting areas, soil depths / volume relationship to the proposed planting species

Additional information relating to planting areas, soil depth and soil volume has been provided as part of the updated Landscape Plans (Drawing No. SSDA_203). The plans confirm that small trees will be provided with a minimum soil volume of 9 m³ per tree, while medium trees will be provided with a minimum soil volume of 35 m³ per tree. Trees along the northern boundary will be planted within deep soil zones, ensuring the ongoing viability of the proposed landscaping.

15. Opportunities for mature tree planting along Rangers Avenue

The proposal has been revised to explore opportunities for further planting along the Rangers Avenue side of the site. Specifically, a significant deep soil zones are provided with 6m minimum dimension as per ADG along the southwestern side of the site. A screenshot of drawing SSDA_202 depicting the deep soil planting area is shown below.

		
<u>Acoustic Privacy:</u> 16. Explore opportunities to amend the internal layout of individual apartments to ensure rooms with similar uses are grouped together to avoid noise transfer between apartments, particularly in instances where bedrooms adjoin the principal living areas of neighbouring apartments (e.g. the bedroom of apartment 102 adjoins the living room of apartment 101).	The internal layouts of the westernmost apartments (101, 201, 301, 401 and 501) have been amended by reversing the bedroom and living room arrangements. This change groups bedrooms together, rather than locating principal living rooms adjacent to bedrooms in neighbouring apartments. The revised layout and extension to party walls between apartments, improves acoustic privacy and reduces the potential for noise transfer between apartments.	RTS Appendix D and E
<u>Gross Floor Area (GFA):</u> 17. The Department notes that the affordable housing lobby at the lower ground level (east) is excessively large and disproportionate with the adjoining market apartment lobby. Given this constitutes affordable housing GFA, the Department	The basement includes two separate Build to Sell lobbies (99m² and 16m²). The two lobbies serve three different cores. Separate to those lobbies is the Affordable Housing Lobby, which has been reduced from 51m² to 45m², in response to DPHI feedback to reduce lobby GFA and transfer back to AFH apartments. Comparative to the BtS lobby, the	RTS Appendix E

requires you to reduce the size of this lobby and utilise that GFA within the apartments. 18. The Department notes that due to the fall of the land, a portion of lower ground level is located above ground level. In this regard, you must review the GFA calculation diagrams to demonstrate that: - all above ground areas excluded from the GFA calculation are consistent with the GFA definition in Mosman Local Environmental Plan 2012 - the GFA of the services rooms on levels 1 – 5 (marked BOH) are apportioned between market and affordable housing components. 19. If the GFA calculations are modified in line with the above requirements, you must demonstrate that a minimum 15% of the GFA is dedicated to affordable housing in accordance with Chapter 2 of the Housing SEPP.	AH is of a reduced size however still provides sufficient circulation space to ensure equitable amenity and a pleasant lobby waiting experience. A review of the proposed design has been conducted against the GFA definition in the Mosman Local Environmental Plan 2012 and is shown in Sheet no. DA5001 of the Architectural Plans. The Back of House is apportioned between the market and affordable housing components. The affordable housing GFA remains at 15% in accordance with Chapter 2 of the Housing SEPP.	
<u>Building Height:</u> 20. Provide amended architectural plans (including elevation and cross-section plans) to include annotation of the existing RL(s) directly below the highest point(s) of the buildings. 21. Provide an amended height plane diagram with annotation of the extent of the building height breach (in RLs and meters) based on the existing ground level RLs.	Amended Architectural Plans with annotation of the existing RLs below the highest point of the building and an amended height plane diagram with annotation extent of the building height exceedance is shown in Sheet No. DA5030. All cross section and longitudinal sections are depicted in Sheet No. DA5032, DA5033 and DA5034. As a result of the revised building design, the building height has been reduced, and the Clause 4.6 variation for Building Height has been updated.	RTS Appendix E

22. Provide additional cross and longitudinal sections so that the height breach can be assessed in detail at all points, given the slope of the land. 23. Provide an updated clause 4.6 variation request with revised buildings and associated exceedances, if required, as a result of the amended base RLs. 24. Provide contextual elevations showing adjacent development and surrounding context to clarify scale, height and interface conditions.		
<u>Additional Information:</u> 25. Provide a revised ADG compliance matrix which demonstrates how each dwelling (including each affordable housing apartment) performs against all applicable ADG objectives, design criteria and guidance. 26. Provide numeric confirmation and specific reference to plans or details to establish consistency with the respective design criteria, rather than stating 'compliance has been achieved'. 27. Provide amended architectural plans which include details demonstrating that all doors to service or other areas open within the site (not on adjoining public land). 28. According to the Waste Management Plan, the building manager is responsible for moving the waste bins from Interim bin room to bin collection room. Provide details of the bin route which does not require the bins to move through the Port cohere and vehicular access routes.	A revised ADG compliance matrix has been provided, including numeric confirmation against each applicable requirement and references to the relevant plans and drawings. All service doors are designed to open within the site boundaries. Waste bins will be moved between the interim bin room and the bin collection room by building management staff only, using a defined and managed route. The movement path is shown indicatively in the waste management report and is located along the edge of the porte cochère with bin movements managed to minimise interaction with other activities. Bin movements will be undertaken in accordance with the Waste Management Plan, including appropriate timing and supervision, to ensure safe and orderly operation within the service area.	RTS Appendix F

Transport for NSW (TfNSW)		
TfNSW has reviewed the Environmental Impact Statement (EIS) and advises that TfNSW has no requirements as the proposed development is unlikely to have a significant impact on the classified road network.	Noted – no action required.	N/A
Mosman Council		
<u>1. Location within the low and mid rise housing outer area</u> Ensure that the proposal is within the definition of low and mid rise housing outer area under Section 163 and walking distance under Schedule 10 of the Housing SEPP	Site is within 800m walking distance.	
<u>2. Building Mass, Visual Impact, Context and Character</u> - Proposal represents overdevelopment - Bulk, length and unbroken massing creates a dominant street wall - Land directly north is zoned C4 due to scenic protection values - Proposed development is not consistent with the character of the surrounding development - Proposal obstructs the views along the adjacent C4 zoned lands. - Appropriate transition to low scale residential properties required to adjacent C4 land	<u>Overdevelopment</u> The proposed Part 6 and Part 7 storeys development with 44 apartments is an intended outcome of the recent NSW housing reforms to provide supply and affordable housing in well-located sites. The proposed density and yield are commensurate with the Low and Mid Rise Housing Policy and the Infill Affordable Housing Policy and is suitable at a location within 800m from the Cremorne Town Centre. The built form and massing have been amended to reduce the building's impact on the visual amenity of the surrounding area. In particular, the setbacks have been increased from 3 metres to 4.5 metres at Levels 4 and 5. At Level 6, the setbacks to the eastern and western apartment boundaries have been increased to 7.8 metres and 5.8 metres respectively. These changes reduce the perceived bulk of the building, increase separation distances to the eastern and western boundaries, and minimise visual and view impacts when viewed from the northern side of Bloxsome Lane. The	RTS Appendix D and E

▪ Unbroken building mass reads as a continuous podium with a repetitive style ▪ Section 20(3) of the Housing SEPP requires development to be compatible with the desired character and future character of the local area. ▪ Assessment under Schedule 9 of Housing SEPP required.	increased setbacks and reduced bulk also address Council's concerns regarding the extent and scale of the street wall, resulting in a more articulated and visually recessive built form at upper levels. Additionally, balcony recesses and articulation on the southern elevation have been increased to reinforce the proposal as three distinct masses rather than a single continuous built form. This highlights that the proposal does not read as a continuous podium with a repetitive style. <u>Character</u> The proposal is prepared in accordance with the Low and Mid Rise Housing Policy and Infill Affordable Housing Policy. Therefore, it will be aligning with the desired future character and mediate with the surroundings. Therefore, the proposal is consistent with Section 20(3) if the Housing SEPP. An assessment against Schedule 9 of the Housing SEPP has been undertaken by Woods Bagot and is included in the Design Verification Statement at Appendix D.	
<u>3. Scenic Protection Area</u> ▪ The site is located within the Mosman Scenic Protection Area under Clause 6.4 of the LEP ▪ Council has rezoned all R2 Low Density Residential to C4 Environmental Living in the Scenic Protection Area to not allow complying development under the Codes SEPP. ▪ Proposal hasn't demonstrated that adequate measures have been taken to minimise visual impact, maintain natural landform to protect the scenic qualities	The site is located within the R3 Medium Density Residential Area and therefore matters pertaining to the C4 Environmental Living zone are not relevant. The VIA confirms that the proposed development is reasonable and appropriate in the scenic protection area. The proposal maintains the existing rock wall face and integrates with this existing natural landform. The proposal includes substantial tree canopy and landscaping which will contribute to the landscaped character of this immediate locality.	RTS Appendix K

<u>4. Building Height, Wall Height & Clause 4.6 Variations</u> ▪ Council calculates wall height to be 25.061 (RL 71.83 Wall/Parapet and RL 46.229 Ground) instead of 20.7m wall height on Clause 4.6 ▪ Council calculates building height of 25.66m (Top of parapet – RL 71.830 and Ground – RL 46.170) while clause 4.6 states 25.597m ▪ Wall height development standard should be 7.2m instead of 7.5 nominated in the Clause 4.6 ▪ Council contends that greater wall height occurs in the south-east instead of south-west. ▪ Council believes there is no merit in allowing any variation to height requirements given in-fill affordable housing bonuses given to site in a highly sensitive area. ▪ Site is inappropriate for in-fill affordable housing bonus under the In-fill Affordable Housing Practice Note (December 2023) as the site is located within the Scenic Protection Area and fails to provide appropriate transitions to low scale residential properties to C4 Environmental Living and Holt Estate Heritage Conservation Area	The architectural plans have been amended which has resulted in a reduction in the building height exceedance and wall heights. The clause 4.6 has been amended to reflect the revised building heights. It is noted that the breach in building height is directly associated with the topography of the existing ground level dropping and therefore an isolated dip in the site. The majority of the building is situated comfortably below the height limit.	
<u>5. Floor Space Ratio</u>	The design has been amended and the GFA recalculated to ensure compliance with the relevant definition. Service rooms have been excluded from the GFA calculation in accordance with the definition, while Back of	RTS Appendix E

- Affordable housing component includes portions of service rooms not used exclusively for the purpose of Affordable Housing on Levels 1-5 - Common staircase and Enclosed courtyards on Units 601 and 602 are excluded from GFA calculation and should be included according to Standard Instrument definition - Inclusion of those areas will make the GFA exceed 1.95:1 Maximum FSR under the Housing SEPP - Proposal does not satisfy the Objectives relating to Clause 4.4(1)(a) of the MLEP	House (BOH) areas have been apportioned between the market and affordable housing components in line with DPHI requirements (dot point 18). In relation to the common staircase landings, the Gross Floor Area definition under Mosman LEP 2012 excludes “any area for common vertical circulation, such as lifts and stairs” (exclusion (d)). As the landings form an integral part of the staircase, they constitute common circulation rather than private hallways and are therefore excluded from GFA. Parking areas are also excluded under the clause (g) Mosman LEP GFA definition and are therefore not applicable. The internal courtyards at the penthouse level are open to the sky and not weather-protected, effectively functioning as voids, and accordingly qualify for exclusion under clause (j) of the GFA definition.	
<u>6. Views, Vistas and Amenity Impacts</u> - Proposal hasn’t minimised view loss on adjacent (upslope) properties in accordance with Control P4 of Part 4.3 (View sharing) of the MDCP - Proposal creates a wall of development and breaking into smaller parts will be more suitable. - The VIA is misleading as it states part of the site is in the Scenic Protection Area (SPA) while the full site is within the area - No visual analysis is conducted on development towards the north	The Mosman Development Control Plan does not apply to this site, as the development is classified as State Significant Development. The proposal does not present as a single wall of development. The built form has been deliberately articulated and broken into three distinct building elements through setbacks, vertical separation and varied balcony articulation, reducing perceived bulk and improving compatibility with the surrounding context. These design measures, together with increased setbacks to the site boundaries, provide appropriate spatial separation and a graduated transition in scale that respects the established residential character. The VIA has been updated to clarify that the entire site is located within the Scenic Protection Area. All relevant figures, mapping and text have been corrected to ensure consistency. The updated VIA includes visual analysis of development to the north that adjoins Bloxsome Lane. All fieldwork was completed on 30 April 2026 and the updated VIA forms part of the response to submissions.	RTS Appendix D, E and K

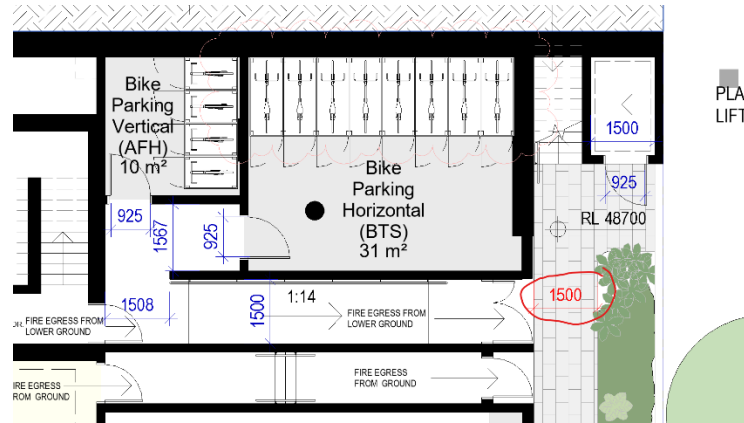
- There is not adequate spatial separation and transition to neighbouring low scale residential properties - Car park should be reconfigured to increase setback to increase deep soil area	The proposed car park has been reconfigured to provide an increased setback from the northern boundary to increase deep soil area.	
<u>7. Heritage</u> - HIS does not address the impact of the proposed height, bulk and scale on the Holt Estate Conservation Area - Proposal does not address the significant rock face / retaining wall along Rangers Avenue which forms the heritage fabric	The addendum to the HIS highlights that the proposed architectural design has been revised to ensure that the proposal sits more comfortably within the site context and minimises visual impact on the Holt Estate Conservation Area. The setbacks have increased to 4.5m at Levels 4-5 and penthouse setbacks of 6m west and 7.9m east. This confirms that the proposed built form does not present as an intrusive or dominant element of the site and has been designed to respect important heritage views and the broader visual setting of the heritage area. The Mosman Residential DCP 2012 and the Statement of Heritage Significance both state that the Holt Estate Conservation Area has been altered over time through house modifications, additions, paintings, high fences and garage placements, and street trees will “ameliorate the effect of the additions and alterations.” The revised proposal has increased deep soil planting specifically along the northern side of the site, effectively screening the properties on the northern side of Bloxsome lane from the proposed development, at the lower levels. Additionally, the proposal will not have a significant impact on the ongoing health of the street trees within the Holt Estate Conservation Area, confirming that the existing streetscape along Holt Avenue will be preserved as part of this proposal. The rock face and retaining wall along Rangers Avenue will be retained as part of the proposal, and the photographic Archival Recording prepared in accordance with the NSW Heritage guidelines <i>Photographic Recording of Heritage Items Using Film or Digital Capture</i> will be conducted prior to any demolition or modification works at the site. A Schedule of Conservation Works is also to be prepared for the stone block sections of the rock wall.	RTS Appendix O

	Construction activities will also be conducted in accordance with a Construction Management Plan to be procured prior to the Construction Certificate stage to ensure that the construction activities avoid disturbance to the rock wall. Additionally, reconfiguration of the Porte Cochere and the reduced size of the substation will improve the interface of the public domain.	
<u>8. Landscaped Area / Deep Soil</u> - Proposal doesn't comply with the NSW Tree Canopy Guide for the LMR Housing, with min 20% Tree Canopy and 15% min deep soil - Deep soil requires a minimum of 3m x 3m (9sqm area) - If a 7% minimum deep soil requirement is applied, the proposal requires a minimum 251.58sqm to comply. The proposal therefore has a shortfall of 49.78sqm of deep soil. - Given the sensitive location of the site being wholly within the Scenic Protection Area there is strong merit in applying the enhanced provisions under Table 7. When the Table 7 provisions are applied, the proposal has a shortfall of 337.3sqm of deep soil. - Proposal does not satisfy the MLEP Landscaped Area controls	<u>NSW Tree Canopy Guide for Low and Mid Rise Housing</u> As per Council's request, the updated proposal exceeds the required values within Table 7 of the Tree Canopy Guide. The proposal provides 790.4m² of tree canopy, which translates to 22% of the site area, exceeding the 20% requirement and 584m² for deep soil, equating to 16.2% of the site area, exceeding the 15% requirement. The definition of Deep Soil within the Tree Canopy Guide for Low and Mid Rise Housing has been adopted as part of the proposal. Deep soil calculations based on a 3m minimum horizontal dimension has been utilised in the updated design, as detailed in SSDA_202. Based on the results provided, the proposal achieves 584m² of deep soil area, equivalent to 16.2% of the site area, exceeding the 15% requirement on the Tree Canopy Guide. <u>Clause 6.6 MLEP</u> As detailed above, the NSW Tree Canopy Guide for Low and Mid Rise Housing override the Council LEP landscaping controls. The revised proposal has significantly upgraded the amount of landscaped area within, satisfying the NSW Tree Canopy Guide.	RTS Appendix M
<u>9. Quantity and Quality of Landscaping</u> Quality and Quantity of landscaping is inadequate as it requires all existing trees to be removed	The Basement and Carpark design has been updated to provide a setback of approximately 3m from the northern boundary along Bloxsome Lane. This design change has provided deep soil area which provides new substantial landscaping around the building.	RTS Appendix M

▪ Reinstated planting is inadequate as it has narrow setbacks to the east, west and Rangers Avenue ▪ Limited deep soil on the northern side reduce opportunity for screen planting and canopy trees ▪ Majority of Canopy trees to be planted ad hedge and unlikely to establish suitable height >5m, do not reflect or contribute to the natural biodiversity of the area ▪ Substantial proportion of the site is impervious and not consistent of containing urban run-off.	In the revised plan, medium and small sized trees will be planted along the east, west and northern side of the site, providing screen planting and canopy along for the adjacent properties and properties along the C4 boundary. Additionally, soil depths are now provided in the updated plans by Wyer & Co. The proposed soil depth will be adequate for the planting of small to medium trees as small trees will require minimum 9m² of soil while a medium tree will require minimum 35m² of soil. The proposed tree planting along the eastern, western and northern site boundaries will enhance the streetscape and contribute positively to the garden-style character of the area. The increase in deep soil land and landscaped area in the new proposal reduces the amount of the site that is impervious and improves the proposal's ability to contain run-off. The Mosman DCP is not applicable to State Significant Development Applications. The proposal satisfies the requirements for the NSW Tree Canopy Guide for Low- and Mid-Rise Housing, ensuring that the proposal satisfies the requirements of Schedule 9 of SEPP Housing, Design Principles for Residential Apartment Development.	
<u>10. In-fill affordable housing</u> ▪ Affordable housing comprises 10 x 2 bedroom apartments and does not provide diversity to affordable housing tenants ▪ Council recommends that all affordable housing should be operated by a Community Housing Provider in perpetuity (beyond 15-year minimum requirements)	The applicant has engaged Home Ground to manage the affordable housing portfolio. The apartment typologies have been selected through ongoing conversations with Home Ground and will meet the demand within their portfolio. The 15 years requirement is a policy position, which the SSDA complies with.	Original Submission Appendix K

<u>11. Off streetcar parking design, driveway and sight lines</u> Proposal fails to address s5.10 Planning Control P1, P7, P7A P22 of the MDCP and 2.4.2 of the AS2890.1 regarding maximum driveway width, column arrangement and security door widths, pedestrian sight splays, entrance and egress routes at lower ground floor, no car wash bay and no electric vehicle charging infrastructure.	The proposed access driveway has been designed in accordance with the swept path analysis to ensure that vehicles can safely enter and exit without impacting on vehicle movement along Rangers Avenue. The updated design provides a narrower driveway and a pedestrian sight triangle, satisfying the requirements of AS2890.1. An updated Swept Path analysis is provided in Appendix A of the Traffic Report which confirms that a B99 vehicle can access the site without clashing with adjoining structures. Detailed line-marking and signage will be developed to identify paths of travel for carp park users. Additionally, the proposed driveways have been designed in accordance with AS2890.1, confirming that there will be no scrappage of vehicles at the vehicle crossing. Design of Car Wash Bays are readily capable within the existing, and all residential parking spaces will be designed with enabling infrastructure to facilitate the introduction of electric vehicle charging stations.	RTS Appendix J
<u>12. Bicycle Parking Provisions</u> - AS2890.3:2015 requires 20% of bicycle parking to be ground-level horizontal parking, Council recommends the proposal to exceed minimum horizontal - Access to bicycle parking areas have not been adequately considered, including: 800mm width bicycle room doors being too narrow, 1.5m accessway not maintained on all section of the necessary travel paths, access corridor prior to the bike room showing a step.	The bicycle parking layout has been amended in accordance with Council's advice to include 8 horizontal bike parking spaces. In the amended layout, 60% of the bike parking spaces will be horizontal bike parking, ensuring that the proposal exceeds the 20% minimum requirement in accordance with AS2890.3:2015. This further encourages cycling to Cremorne and Spit Junction Centres within comfortable cycling distances. Further amendments have been made to the proposed access to the bicycle parking areas. As shown on Sheet DA2010 of the Architectural Plans, bicycle room doors are designed with a clear width of 925mm, exceeding Council's nominated width of 800mm. Minor landscaping adjustments, including a 270mm widening, are proposed in the current amendments along the accessway to provide a 1.5m wide approach to the bicycle parking room, allowing adequate space for bicycle manoeuvring. No steps are proposed within the accessway; instead, a ramp with a maximum gradient of 1:14 is provided. It should be noted that the previous drawing referenced	RTS Appendix E

tactile indicators, and no steps were ever proposed. The drawings have now been updated to avoid confusion; Accordingly, the proposal achieves compliance with the BCA.



13. Safe Loading and Unloading of Vehicles

- Vehicular loading is inadequate and doesn't satisfy Planning Control P10 of the MDCP to accommodate safe loading and unloading of vehicles

With regards to Council's concern on the safe loading and unloading area, an additional swept path diagram has been conducted by JMT Consulting in **RTS Appendix J** confirming that the Medium Rigid Vehicles (MRVs) and waste trucks will be able to safely set down outside of the building entry point on Rangers Avenue, ensuring that during loading and unloading, general traffic movements will be unimpeded.

RTS Appendix J

14. Waste Management

- Council requests provisions be made for on-site waste collection
- Proposal should not rely on on-street parking on Rangers Avenue, impacting on limited on-street parking

The current waste management requirements adopted by Council require onsite collection. The proposed development has been prepared in accordance with the current requirements. As depicted in the Updated Operational Management Plan (**RTS Appendix L**) and the Letter of Response to Traffic Impact Assessment (**RTS Appendix J**), in the proposed design, the Council waste truck will be set down outside of the building entry point on Rangers Avenue, ensuring that the bin collection will not impede on general traffic movements along Rangers Avenue. This confirms that the proposal does not rely on the use of the on-street parking to be available.

RTS Appendix L,
RTS Appendix J

2 Bin Chutes are required for both recyclable and non-recyclable with 2X 240 bins in each chute room.		
<u>15. Public Domain Works / Land Dedication</u> - Council requested that the applicant dedicate a small section of Bloxsome Lane to Council Free of Charge for widening, construction of footpath as pedestrian safety measure, proposal should be provided for the requested land dedication for Bloxsome Lane. - Drawing DA2009 shows 'possible area for future public domain initiatives to be approved at a later date - Public Domain Works on Rangers Avenue should be identified and detailed now due to heritage considerations - Proposal does not allow for requested land dedication with the Ground and Lower Ground levels.	The proposal does not include the dedication of land. Rather, the applicant seeks to upgrade the portion of Rangers Avenue and Bloxsome Lane adjacent to the site boundary. As Council does not have a specified public domain manual for the LMR areas, the detailed design of upgrades within Bloxsome Lane and Rangers Avenue will be subject to separate public domain approvals, in accordance with standard conditions of consent. The area in which the applicant proposes to upgrade has been annotated on the public domain plan.	RTS Appendix E
<u>16. Contamination</u> Preliminary Site Investigation (PSI) doesn't provide sampling or laboratory analysis, relies on historical and anecdotal information and contains limitations and consultant disclaimers	An updated Preliminary Site Investigation (RTS Appendix T) and Hydrogeological Report (RTS Appendix U) has been conducted by EI Australia in response to Council's requirements. Specifically, it is noted that the Preliminary Site Investigation has been conducted in accordance with the State Environmental Planning Policy and the EPA (2020) Consultants Reporting on Contaminated Land. The Hydrogeological Report also provides guidance regarding the dewatering methodology, groundwater treatment requirements, monitoring and reporting .	RTS Appendix T and U

<u>17. Flooding</u> - Section 3.2 of the FIRA states that the site is not impacted by 0.5 to 20% AEP but the relevant maps in the adopted Mosman LGA Flood Study (2025) show that the site is impacted; for example in the 1% AEP. - Draft Mosman LGA Flood Study (2025) states that the site is affected by flood hazard categories.	It should be noted that the NSW DCCEEW Water Group has reviewed the site and has not identified an issue with regards to the flooding and water licencing aspects of this application. Additionally, please refer to the Letter of Response to Flooding Comments prepared by BG&E depicted on RTS Appendix I for specific responses to Council's enquiries regarding the Flood modelling. The letter notes that the site is only affected by 1% AEP flood maps on the edge of a flood path from a direct rainfall and filtering approach and not specifically flooding that would pose a risk to life or require mitigation works. An extract of the 1% AEP Flood Depth is shown below: 	RTS Appendix I
<u>18. Stormwater Management</u> Connection to pit at intersection of Rangers and Park Avenue not supported as it will create long term issues to Park Avenue. The site's susceptibility of stormwater inundation	Subsequent to the receipt of the Council submission, Eterno (the applicant) and BG&E (Stormwater consultant) meet with Council on 18/03/2026 regarding the proposed drainage solution. Council has advised that they will support an extension of the proposed stormwater line by approximately 60m to provide a connection to the stormwater culvert / pipe between Park Avenue and Avenue Road. The proposed Stormwater layout has been	RTS Appendix G

has not been considered with Council’s flood study levels.

amended based on the discussions with Council. An extract of the proposed Stormwater Plan is shown below depicting the layout of the proposed stormwater line.



19. Geotechnical Impacts

- Needs to consider the site’s cliff and its susceptibility to landslips
- Council is not supportive of anchoring which may go into neighbouring properties.
- Geotechnical conditions are required to ensure proposal addresses geotechnical matters and does not impact neighbouring properties

The Geotechnical Investigation provides a comprehensive investigation that includes borehole drilling, laboratory testing, groundwater monitoring, and detailed recommendations for foundations, excavation, and retention systems. The proposed development will be appropriate to proceed subject to the engineer’s recommendations.

The design and construction approach has been reviewed to address Council’s concern regarding anchoring into neighbouring properties. The Geotechnical Investigation Report confirms that the proposal does not require ground anchors extending beyond the site boundary. The reference in the report regarding obtaining neighbouring permission is a standard

RTS Appendix N

	precautionary measure only and does not indicate that anchoring into adjoining properties is proposed or necessary for the development. The updated Geotechnical Investigation responds to the Landslide Risk Management Assessment (LRM). The assessment conducted in accordance with the Australian Geomechanics Society Practice Note Guidelines for Landslide Risk Management (2007) concluded that the site consists of shallow, competent Class 3 sandstone bedrock and the absence of significant residual soils. Therefore, the proposal is assessed to have a very low risk of landslides with risks limited to localised rock block instability associated with excavation activities rather than broader landslip mechanisms.	
<u>20. Accessibility</u> - Proposal is non-compliant with Section 5.11 'Accessible buildings, adaptable and universal housing' of MDCP as it needs to meet or exceed liveable Housing Design Guideline's Silver Level universal design features - Drawing DA5010 identifies that only 20% of units are proposed to be LHA Silver Level compliant	The proposal provides 20% of apartments designed to meet the Liveable Housing Design Guidelines (LHDG) Silver Level universal design features, as identified on Drawing DA5010. This is consistent with the minimum requirement of the Apartment Design Guide, which requires a minimum of 20% of apartments to achieve Silver Level compliance. While Section 5.11 of the Mosman DCP seeks developments to meet or exceed Silver Level universal design features, the proposal satisfies the applicable minimum benchmark under the Apartment Design Guide and is therefore considered acceptable in this regard.	
<u>21. Building Design</u> - There are a number of deviations from the BCA RtS provisions. - BCA report outlining non-compliance with Dts provisions and evidence from unrestricted certifier is required - Porte cochere creates safety issues regarding the area of concealment	The updated BCA Report has been received from Certatude, confirming that the modified SSDA design documentation is capable of compliance with BCA 2022 AMDT 2 and there are no compliance impacts to the BCA Report. The Architectural Plans have also been updated to address those issues, where the doors of the bin room, meters and substation do not open over public land or the footpath of Rangers Avenue.	RTS Appendix P

- bin collection room creates poor amenity and reduced visual connection - Narrow Ground floor lobby - No Corridor is provided with daylight or natural ventilation		
<u>22. Public Interest</u> - Proposal is not in public interest, not compliant with relevant controls and standards to provide adequate residential amenity - Undesirable Precedent	- The proposal effectively provides delivers 44 dwelling including 10 affordable housing units in a convenient location, confirming that it is consistent with the vision established by the Housing Accord, Low and Mid Rise Housing Policy and the In-Fill Affordable housing policies, and therefore is in the public interest to combat the housing crisis. - The provision of Affordable Housing is in public interest and it strengthens diversity and supports key worker housing. - The proposal will not set an undesirable precedent as there are currently other proposals utilising the Low and Mid Rise pathway within Mosman Council including Redan Street and Almora Street. Therefore, the development will not set a precedent.	
Sydney Water		
Detailed servicing requirements (including any potential extensions or amplifications) will be provided once the development is referred to Sydney Water for a Section 73 Compliance Certificate under the <i>Sydney Water Act 1994</i> .	Noted – no action required.	N/A
Ausgrid		
No objection to the proposal. The Applicant is encouraged to continue to discuss their requirements directly with Ausgrid, and that a	Noted – no action required.	N/A

connection application is made to as soon as practical.		
NSW Environment Protection Authority (EPA)		
The EPA has no comments to provide on this project and no-follow up consultation is required.	Noted – no action required.	N/A
Environment, Energy and Science Group (EES) at DPIE		
All relevant flood related issues have been adequately addressed and there are no further requirements or comments in this regard.	Noted – no immediate action required.	N/A
Public Submissions		
<u>Traffic Congestion and Safety</u> - Traffic assessments underestimated peak periods, omitted weekend data, and did not reflect real congestion levels. - Construction traffic, including road closures and heavy vehicles, is expected to cause major disruption and safety risks. - Increased traffic volumes raise safety concerns for pedestrians, school children, and cyclists on constrained streets. - Carpark design and traffic flow issues may worsen congestion at key intersections and surrounding streets. - Existing roads, including Military Road and Rangers Avenue, are already at capacity.	▪ The proposal's impacts on Rangers Avenue, Bloxsome Lane and other roads within the locality is likely to be negligible. As stated in the Transport Impact Assessment (TIA), the proposal is only likely to generate 4 vehicle trips in the AM peak hour and 3 vehicle trips in the PM peak hour, confirming that any impacts onto Rangers Avenue is likely to be negligible. The increase is so minor it would not register any difference that it cannot materially affect conditions. ▪ The proposed development is forecast to generate a net increase of between 3 to 4 traffic movements during peak hour periods based on TfNSW guidelines – having a negligible impact on the surrounding road network. The Construction Traffic Management Plan will be procured prior to construction works commencing. ▪ A preliminary Construction Traffic Management Plan (CTMP) has been prepared and included with the Transport Impact Assessment. The preliminary CTMP confirms that construction traffic impacts can be appropriately managed through standard mitigation measures. A detailed CTMP will be prepared prior to commencement of works.	RTS Appendix J

	It is understood that a number of submissions were concerned regarding the proposed traffic conditions onto Bloxsome Lane. However, proposed traffic access will be located on the Rangers Avenue side, which will significantly reduce traffic volume along Bloxsome Lane, making it a more friendly lane for pedestrians to walk, kids to play and school children to go to school.	
<u>Bulk, Scale, Height Issues</u> - The height and overall scale of the development are inconsistent with the surrounding lower-scale neighborhood. - Transitions between the proposed building and neighboring properties are inadequate. - Setbacks, building form, and massing do not meet desired planning guidelines. - Visual dominance and inaccurate renderings contribute to concerns about neighbourhood character impact. - Variation requests for height and scale do not satisfy statutory requirements.	- The built form has been modulated and stepped across the site. Specifically, the top level has been recessed to reduce visibility from the public domain. This confirms that consideration has been conducted in the built form to reduce the proposed impact on the bulk and scale. - Tree canopy and landscaping is also proposed on the north, east and western sides of the site boundaries to create a natural transition to the existing built form along Rangers Avenue and Bloxsome Lane. This results in most levels of the proposed building be obscured by the tree canopy when viewed from the adjoining roads and properties. - The proposal generally satisfies the statutory requirements. Minor exceedances for Wall Height and Building Height are justified in the Clause 4.6, arguing that strict compliance is not merited because the minor exceedance is only due to the site's slope and the wall height is only due to the LEP not accounting for the Infill Affordable Housing and Low & Mid Rise Housing provisions.	RTS Appendix D, E and M Clause 4.6 building height variation
<u>Heritage and Character Impact</u> - The development is inconsistent with local planning objectives designed to protect neighbourhood character. - Demolition of heritage-era homes and impacts on heritage items contribute to loss of historic value.	- The proposed building design retains Mosman's sandstone heritage, character, and the heritage area to the north, with a sandstone podium and articulated façade reducing perceived bulk. - The site is located outside of the Holt Estate Conservation Area and it not in any existing Heritage Listed Item. This confirms that the proposal does not demolition any homes of heritage significance.	RTS Appendix O

- The cumulative impacts on community infrastructure and streetscape character are not fully assessed. - Heritage assessments do not adequately address the significance of the area. - The proposal sets a precedent for future developments that may erode established neighbourhood character.	▪ The proposed development will also be shielded with a line of trees along the northern side of the property adjacent to Bloxsome Lane, reducing the view line impacts of the proposed built form from the Heritage Conservation Areas. ▪ The addendum to the Heritage Impact Statement confirms that the assessment adequately identifies all the heritage items in the vicinity of the site and are assessed as suitable based on the development and potential impacts ▪ The current proposal and future proposals need to go through a rigorous assessment process. The SSDA has been prepared on the back of recent planning reforms which will ultimately result in a change in the built form for certain areas.	
<u>Public Transport Limitations</u> - The area lacks high-frequency public transport, and existing bus services are at capacity. - Pedestrian access issues, including unsafe crossings and inadequate footpaths, reduce connectivity. - The site is beyond acceptable walking distances to major centers. - Other locations within Mosman are more suitable for denser development.	▪ As mentioned above, the site is in a convenient and accessible location within 800m from Cremorne Town Centre, with adequate access to bus services on Military Road towards the Sydney CBD, North Sydney, Chatswood and the Northern Beaches. ▪ Route 230, accessible from Avenue Road with 15 minute frequencies throughout the day provides convenient public transport access between Mosman Wharf and North Sydney / Milsons Point. ▪ The proposal improves pedestrian access on Bloxsome Lane and Rangers Avenue through limiting vehicle access to one single point in the building. ▪ The site is located within the LMR Outer Area. The proposed density is suitable for the site under the recent housing reforms.	
<u>Affordable Housing Misuse</u> - Affordable housing is temporary and does not provide enduring community benefits.	▪ 15 years is the statutory mandate for Infill-Affordable housing, which the proposal complies with. The proposed Affordable Housing will be managed by Bridge Housing for at least 15 years.	Original Submission Appendix K

- Separate access arrangements undermine social inclusion. - Rental affordability is unlikely to meet the needs of essential workers. - Affordable housing provisions appear to be used to justify increased scale rather than meet genuine demand. - The number of affordable units is insufficient relative to project impacts.	▪ From an operational perspective, separate access arrangements are consistent with CHP management models and strata legislation and supports long-term affordability by avoiding unnecessary shared costs. The communal open space areas are all shared and provides for social cohesion amongst the residents. ▪ The proposal correctly utilises the Infill-Affordable Housing provisions, satisfying the demand for affordable housing in Sydney, therefore, there is no "exploitation" of the Affordable Housing policy. ▪ The proposal contributes to providing more affordable housing supply to meet genuine demand. ▪ The policy requires 15% of the GFA to be dedicated to affordable housing, which the project complies with.	
<u>Visual Impact and Scenic Area</u> - The development will cause significant view loss for surrounding properties. - The building's height and ridge-line location create substantial visual dominance. - Visual impact assessments rely on selective methodologies and contain inaccuracies. - Removal of trees and limited landscaping reduce environmental and scenic quality. - Detailed view-sharing analysis has not been provided.	▪ It is noted that all potential view loss will be caused by built form which is permissible under the LMR policy, and as such is anticipated by the policy. Minor height non-compliances do not cause additional view loss. ▪ The proposal will include tree planting on the north, east and western side of the site, which will provide scenic enhancement and visual separation from the Holt Estate Conservation Area.	RTS Appendix K and O Clause 4.6 Building Height variation
<u>Loss of Views</u>	The Visual Impact Assessment is currently being updated following site inspections undertaken on 30 April 2026. The updated assessment will be submitted as part of this Response to Submissions.	RTS Appendix K

- Homes facing the harbour will experience irreversible loss of skyline and water views. - The building's bulk reduces visible sky exposure. - Photomontages underrepresent the true extent of view impacts. - View impacts on heritage areas are insufficiently assessed. - The building's location magnifies view intrusion.		
<u>Excavation and Geotechnical Issues</u> - Deep excavation poses risks to structural stability of neighbouring properties and streets. - Groundwater redirection may increase flooding and drainage issues. - Sandstone excavation heightens risks of landslip and instability. - Removal of mature trees may worsen stormwater issues. - Excavation activities will create prolonged noise, dust, and heavy-vehicle impacts.	▪ Groundwater will be stored in an on-site detention tank ensuring runoff is not increased and will not increase flooding and drainage issues, the proposal also confirms that it will exceed existing flows. ▪ The Geotechnical Report confirms the prior to excavation, dilapidation surveys of all structures including neighbouring properties, test pit along the western and eastern boundaries to expose neighbour footings and in-situ ground conditions at the founding level and footing detail to be reviewed. ▪ Additionally, a letter of response to Stormwater comments have been provided by BG&E in RTS Appendix H confirming that the proposal will include a connection to the stormwater culvert / pipe between Park Avenue and Avenue Road, in which Council has advised is an acceptable solution at the 18/03/2026 Council meeting.	RTS Appendix G and H
<u>Privacy Loss and Overshadowing</u> - Overshadowing will significantly affect neighboring homes, especially to the south and west.	▪ Based on the shadow diagrams provided by Woods Bagot, the proposed shadow largely falls within Rangers Avenue, and the roof form or the upper section of Park Avenue, confirming that the impact on the neighbouring properties is likely to be minimal.	RTS Appendix K

- Assessments do not examine impacts on individual dwellings. - Overlooking will reduce privacy for nearby properties. - Tree-based privacy mitigation is ineffective due to seasonal leaf loss. - Height and bulk of the building intensify overshadowing.	▪ The updated VIA includes visual analysis of development to the north that adjoins Bloxsome Lane. All fieldwork was completed on 30 April 2026 and the updated VIA forms part of the response to submissions. ▪ Privacy impacts are mitigated through apartment layout, setbacks and canopy tree planting along the northern boundary. ▪ Boundary screening trees are evergreen and include Waterhousia and Buckinghamia species which provide foliage throughout the year and seasonal flowering. ▪ Overshadowing impacts are acceptable and do not result in unreasonable amenity impacts.	
<u>Parking Shortage</u> - Visitor parking is inadequate for the number of dwellings. - Street parking in nearby roads is already at capacity. - No space is available for delivery vehicles and moving vans without blocking streets. - Construction worker parking is unaddressed. - Larger apartments are expected to generate higher car ownership.	▪ Proposed Visitor car parking provisions comply with the Mosman DCP. The proposal will have 9 visitor spaces, which is consistent with the DCP requirement. ▪ Given the proposal will provide 91 on-site parking spaces, comprising 83 residential and 7 visitor spaces, the parking is considered sufficient and complies with the Mosman DCP residential parking rates. ▪ Delivery vehicles can drop off in the Porte Corche area within the site without adding extra strain onto Rangers Avenue. ▪ The CTMP identifies that approximately 10–20 construction vehicles will access the site per day, which is lower than anticipated post-construction traffic volumes and is not expected to result in unreasonable impacts on surrounding roads.	RTS Appendix E and J
<u>Noise and Vibration</u> - Heritage homes are vulnerable to damage from construction vibration. - Noise measurements were taken during atypically quiet periods.	▪ During the construction process, vibration monitoring will be conducted at all times to monitor and ensure compliance with vibration limits and protect the adjoining heritage buildings.	Original Submission Appendix V

- Crane operation introduces additional safety risks. - Vibration concerns affect homes with elevated structures and cliffside foundations. - Long construction periods will cause extended disruption.	▪ Dilapidation surveys will be constructed on the adjacent properties prior to construction works to adequately ascertain the vulnerability of damage from construction vibration. ▪ A Construction Management Plan will be provided prior to commencement of construction works to ensure that any disruption is minimised.	
<u>Other Issues</u> - The project conflicts with key strategic planning documents. - Community consultation was limited and insufficient. - Use of SSD and LMR pathways reduces local oversight. - Potential for property value reductions.	▪ The proposal aligns with the Housing Accord, the Infill Affordable Housing Policy and the Low and Mid-Rise Housing Policy by increasing housing supply and delivering affordable housing. It is also consistent with the Greater Sydney Region Plan, North District Plan and the applicable Local Strategic Planning Statement (LSPS). ▪ The State Significant Development pathway is triggered under the Planning Systems SEPP. Pursuant to Schedule 1, Clause 26, the proposal qualifies as SSD as it is consistent with Chapter 2 of the Housing SEPP and has an estimated development cost exceeding \$75 million. ▪ Community consultation was undertaken in accordance with the Department's <i>Undertaking Engagement Guidelines for State Significant Projects</i> and the SEARs. Local oversight was not removed, with Mosman Council consulted prior to lodgement and Council and community issues addressed in the EIS and this RtS. Engagement included targeted neighbour notification, dedicated enquiry channels, and in-person briefings undertaken prior to finalising the application. An additional post lodgement engagement session was also undertaken to brief residents on the project to aid in the preparation of informed submissions. All feedback received to date has been considered and responded to in the EIS and this RtS.	

	▪ Impacts on property values are not a matter for assessment under the Environmental Planning and Assessment Act 1979 and are not considered in determining the application	
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