

11-23 Rangers Avenue, Mosman

Heritage Impact Statement

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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

Urbis Ltd (Urbis) has been engaged by Grand Noble to prepare the following Heritage Impact Statement (HIS) to accompany a State Significant Development Application (SSDA) for the residential development at 11-13 Rangers Avenue, Mosman. The site is made up of seven lots. The legal description of the site is outlined below.

Property Address	Title Description
11 Rangers Avenue	Lot 42/DP2509
13 Rangers Avenue	Lot 41/DP2509
15 Rangers Avenue	Lot 2/DP748842
17 Rangers Avenue	Lot 1/DP748842
19 Rangers Avenue	Lot 39/DP2509
21 Rangers Avenue	Lot 38/DP2509
23 Rangers Avenue	Lot 37/DP2509
Total site area	3,594m ²

This HIS has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-96272465).

Item	SEARs Requirement	Section of Report where response is provided
22. Environmental Heritage	Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines.	Section 6 in this report

The purpose of the project is to facilitate the delivery of high-quality housing development at a strategically located site and deliver a built form outcome that is consistent with the desired future character of Mosman, as established by the Low and Medium Rise (LMR) controls and the in-fill affordable housing provisions of the Housing SEPP. As the development has a Capital Investment Value (CIV) of \$75 million or greater, the application triggers State Significant Development.

This HIS has been prepared to determine the potential heritage impacts of the proposed development on the heritage significance of the vicinity heritage items listed below:

- 'Divided Road', Rangers Avenue, Item #1438 – adjacent to 11-23 Rangers Avenue.
- 'Steps' Bloxsome Lane, Item #1331.
- Holt Estate Conservation Area #C3 – adjacent to the rear.
- Significant rock faces and retaining walls on Rangers Avenue.

The site is not located within a heritage conservation area or individually heritage listed on the LEP.

A detailed impact assessment of the proposed works has been undertaken in Section 6 of this report. The proposed development has been assessed to have no detrimental impact on the vicinity heritage items 'Rangers Avenue Divided Road' and 'Steps Bloxsome Lane'. Any impacts have been mitigated through design based on heritage advice provided by Urbis.

Key aspects of the proposal assessment are listed below.

This HIS supports the demolition of the subject dwellings at 11-23 Rangers Avenue. Some of the dwellings are modern or have been significantly altered. The remaining dwellings are considered typical examples of the architecture of the period, and have been assessed to not meet criteria for heritage listing and are not located within heritage conservation areas.

A small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest scale, predominate and representative part of the significant rock wall along 23-17 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.



Picture 1 The significant rock wall along Rangers Avenue, 21 Rangers Avenue being retained.



Picture 2 Rock wall along Rangers Avenue, stairs to 23 Rangers Avenue being retained.



Picture 3 13 Rangers Avenue where no rock wall is present.



Picture 4 11 Rangers Avenue Rock Wall highlighted with green arrow.

The existing dwellings within the Holt Estate HCA towards do not offer views from the HCA towards Mosman Bay or the Sydney city skyline towards the site. The significant public views and vistas of the Holt Estate HCA Townscape identify the key view as being from Rangers Avenue across to Mosman Bay.

The character and scale of the Holt Estate is predominantly low-density (one – two storeys), Victorian and Federation style houses. Majority of the houses in the HCA have garages to the rear of the houses fronting the lane. The proposed development is part 6, part 7 storey residential development, which is noticeably contemporary in appearance and higher than the residential buildings in the HCA. Impacts of the proposed

development on the HCA are mitigated through architectural design, which follows the existing topography of the area. The location of the site is behind the conservation areas which also has a lane creating a further setback and the development due to this is viewed in the background setting. The view lines and nearest road within of the HCA run east west while the site is located to the south so has limited visibility from the main viewpoints.

The cumulative impacts of the proposed development on the broader context are minimal. The broader Mosman area is primarily low-medium density residential dwellings, with two sections part of the LMR housing policy. The proposed development retains a medium density context, while accommodating an increase in available dwellings within the Mosman area. The proposed development is permissible under the LMR controls and the Affordable Housing SEPP that allows for a 30% uplift in height of the subject site.

For the reasons stated above, the proposed works are recommended for approval from a heritage perspective having regard to the proposed recommendations below.

Mitigation

To mitigate the impact of demolition the following is recommended:

- A Photographic Archival Recording of the existing dwellings should be undertaken prior to demolition. The purpose of the archival recording is to document the existing setting, and the existing houses given the extent of change the is happening in the suburb. The Archival Recording must be prepared in accordance with the Heritage NSW Guidelines for 'Photographic Recording of Heritage Items Using Film or Digital Capture'.
- Retention and protection of the rock wall and sandstone retaining wall (23-17 Rangers Avenue), identified in the Mosman Residential DCP during all works.

1 Introduction

1.1 Background & Purpose

Urbis Ltd (Urbis) has been engaged by Grand Noble to prepare the following Heritage Impact Statement (HIS) to accompany a State Significant Development Application (SSDA – 96272465) for the residential development at 11–23 Rangers Avenue, Mosman (hereafter referred to as the subject site).

The application seeks development consent for the demolition of existing buildings and the construction of a part 6, part 7 storey residential flat building plus basement carparking at 11 –23 Rangers Avenue, Mosman.

- Specifically, the SSDA seeks development consent for:
- Demolition of the existing structures on the sites at 11 –23 Rangers Avenue, Mosman.
- Construction of a residential flat building comprising:
- 44 Residential apartments including 10 affordable housing apartments (equivalent to 15% of the proposed residential GFA).
- Communal open space and amenities.
- 2.5 basement levels for car parking, bicycle parking, waste and plant.
- Vehicular access from Rangers Avenue, in the location of the current access (current vehicle access from Bloxsome Lane will be removed)
- Associated site landscaping.

As the development has a Capital Investment Value (CIV) of \$75 million or greater and is for infill affordable housing, the application triggers State Significant Development.

This HIS has been prepared in response to the requirements contained within the Secretary’s Environmental Assessment Requirements (SEARs) dated 14/10/2025 and issued for the SSDA (SSD–96272465). Specifically, this report has been prepared to respond to the SEARs requirement for environmental heritage, notably:

Item	SEARs Requirement	Section of Report where response is provided
22. Environmental Heritage	Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines.	Section 6 in this report

The site is located within the Mosman Council Local Government Area (LGA) and zoned as R3 Medium Density Residential. It is not located within a heritage conservation area, nor are there any individually listed heritage items within the site under any statutory instrument.

This HIS has been prepared to determine the potential heritage impacts of the proposed development on the heritage significance of the vicinity heritage items listed below:

- ‘Divided Road’, Rangers Avenue, Item #1438 – adjacent to 11–33 Rangers Avenue.
- ‘Steps’ Bloxsome Lane, Item #1331.
- Holt Estate Conservation Area #C3 – adjacent to the rear.
- Significant rock face and retaining walls along Rangers Avenue.

Additionally, a significant rock face/retaining wall has been identified adjacent to the subject site through the Mosman Residential Development Control Plan (DCP) 2012 (amended 2024).

A detailed impact assessment of the proposed works has been undertaken in Section 6 of this report.

1.2 Methodology & Limitations

This HIS has been prepared in accordance with the Heritage NSW guidelines 'Assessing Heritage Significance', and 'Statements of Heritage Impact'. The philosophy and process adopted is that guided by The Burra Charter: the Australia ICOMOS Charter for Places of Cultural Significance, 2013.

Site constraints, opportunities and impacts have been considered with reference to the relevant controls and provisions contained within the Mosman Local Environmental Plan 2012 and the Mosman DCP. This HIS is limited to the assessment of built heritage impacts of the proposal. It is beyond the scope of this report to assess the archaeological potential of the site or assess any potential archaeological impacts as a result of the proposal.

1.3 Author Identification

The following report has been prepared by Lisa Flemwell (Heritage Consultant). Kate Paterson (Director) has reviewed and endorsed its content.

Unless otherwise stated, all drawings, illustrations and photographs are the work of Urbis.

2 Site Description

2.1 Subject Site Location

The subject site is located at 11-23 Rangers Avenue, Mosman, located within the Mosman Council Local Government Area (LGA). The subject site is located on Borogegal and Cammeragal Land.

The site is made up of the following lots:

Address	Lot and DP
11 Rangers Avenue	Lot 42 on DP2509
13 Rangers Avenue	Lot 41 on DP2509
15 Rangers Avenue	Lot 2 on DP748842
17 Rangers Avenue	Lot 1 on DP2509
19 Rangers Avenue	Lot 39 on DP2509
21 Rangers Avenue	Lot 38 on DP2509
23 Rangers Avenue	Lot 37 on DP2509

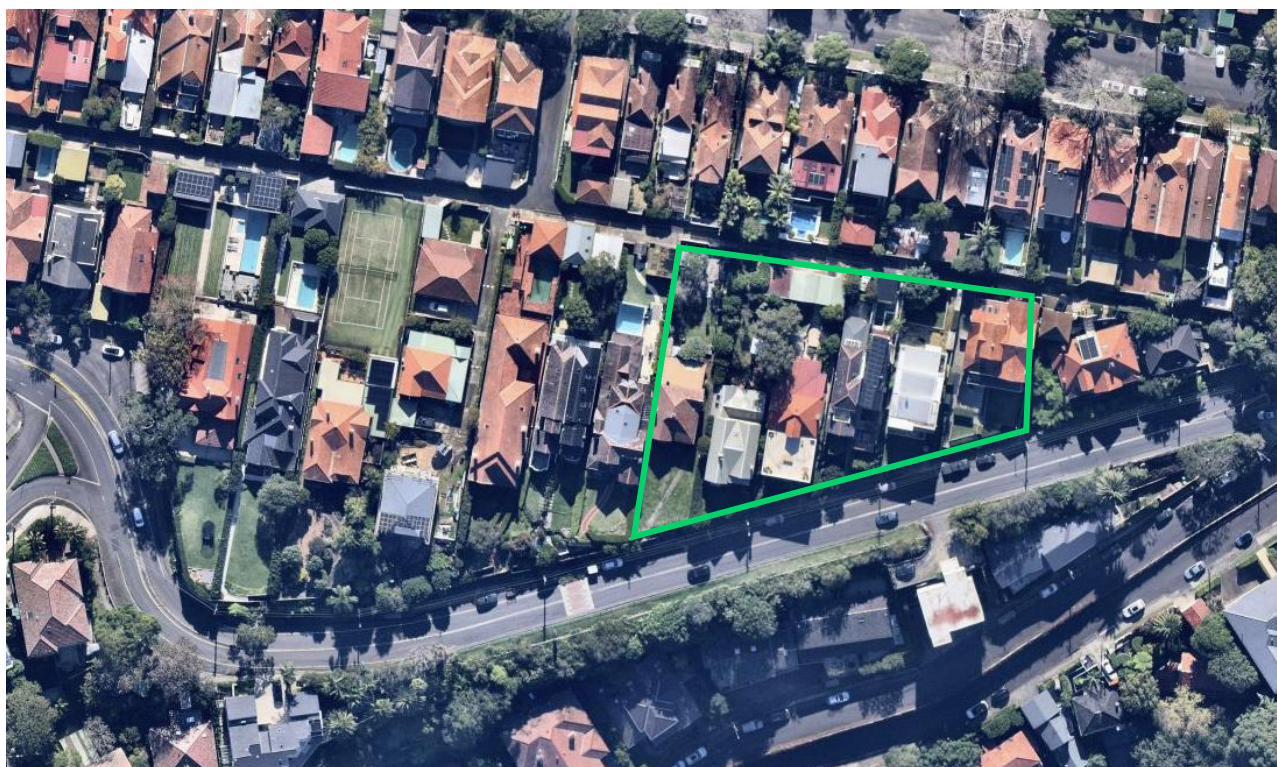


Figure 1 Location map showing the subject site outlined in green.

Source: Nearmap, 2025. Annotated by Urbis.

The site has a frontage of approximately 80m to Rangers Avenue and approximately 78m to Bloxsome Lane. The side boundary to the east is approximately 28m and 64m to the west. The site has a total area of 3,594m².

The site is located within the LMR 'outer area' and within 800 metres walking distance to Cremorne Town Centre and as such, is subject to the LMR housing controls.

The site is currently occupied by seven single, 2, 3 and 4 storey residential dwellings at 11 –23 Rangers Avenue, Mosman which will be demolished. The site currently has vehicular access from Rangers Avenue and Bloxsome Lane. Bloxsome Lane is a very narrow, single lane which is a no through road, which ends at the heritage item 'Steps' Bloxsome Lane.

2.2 Setting

The subject site has dual frontages with a southern aspect to Rangers Avenue and a northern boundary to Bloxsome Lane. The subject site is positioned between the Mosman and Cremorne town centres and located primarily within a residential area. The subject site has harbour views to the south that include views of Sydney Harbour and the city skyline.

The topography of the area is characterised by a steep sloping hillside, the steepest at the rear, north boundary, falling south. The subject site slopes from high points at Bloxsome Avenue to low points at Rangers Avenue with approximately 8m level change. The subject site slopes more gently west to east with a change of level approximately 2.5m.

The Holt Estate Heritage Conservation Area is adjacent to the rear of the site characterised by Victorian and Federation style houses that are of low-density residential dwellings, most of which would have been erected after the area was subdivided in 1902.



Picture 5 View toward the city skyline and Harbour Bridge from the site.

Source: Urbis, 2025.

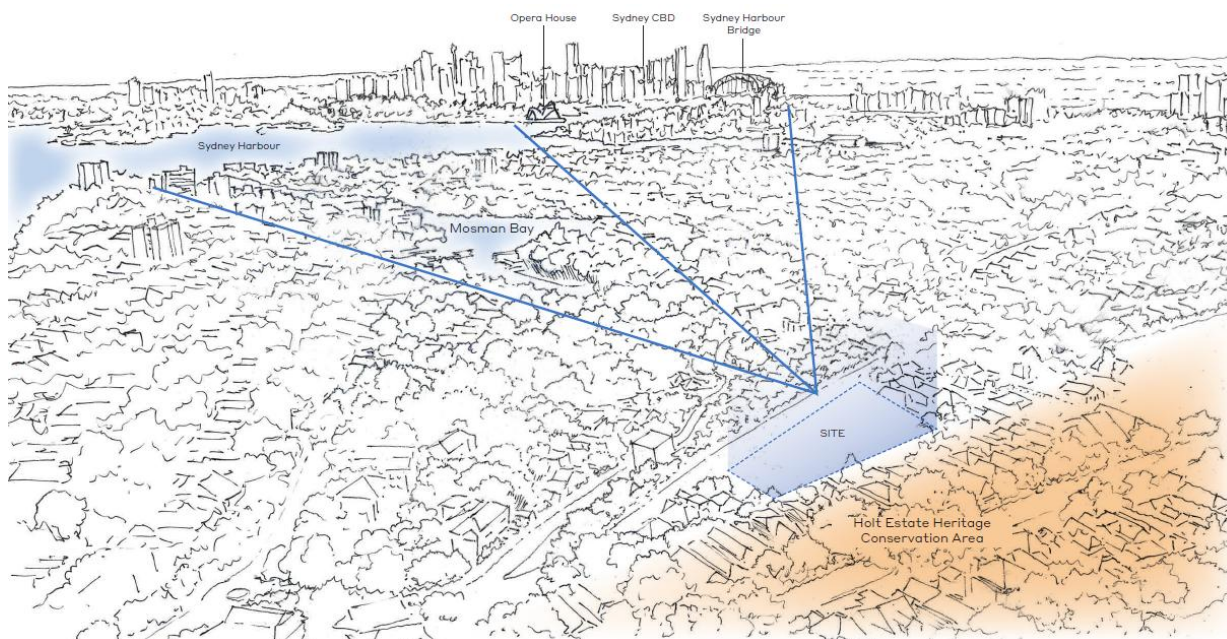


Figure 2 Sketch showing the site and context of the site, showing the views across the harbour and the location of the Holt Estate HCA.

Source: Woods Bagot, Planning Brief, 2025, p.4.



Picture 6 Example of low-density residential dwellings in the Holt Estate HCA.

Source: Urbis, 2025.



Picture 7 Looking down Bardwell Lane, example of more houses within the HCA.

Source: Urbis, 2025.



Picture 8 View to the east from the upper level of 21 Rangers Avenue.

Source: Urbis, 2025.



Picture 9 View to the north, facing towards the Holt Estate HCA, as seen from 21 Rangers Avenue.

Source: Urbis, 2025.



Picture 10 View to the south as seen from 21 Rangers Avenue.

Source: Urbis, 2025.

2.3 The Subject Site Description

2.3.1 11 Rangers Avenue, Mosman

11 Rangers Avenue is a low-scale highly modified Federation style residential dwelling that fronts Rangers Avenue, with garage and rear access via Bloxsome Lane. The property is accessed through a door leading to a stepped landscape yard, which extends to a modern deck. The two-storey house features a rendered modified facade the ground level. The upper storey boasts a projecting gable above a large window and includes a large dormer window extension. A tall chimney topped with terracotta pots is seen at the eastern elevation. The upper storey has been rendered and painted in a neutral colour palette.

The house has a stepped landscape garden, with glass panels on top of a masonry wall, which is stepped back from the decorative sandstone retaining wall. At the street level a small section of significant rock wall sits below the decorative retaining wall.



Picture 11 11 Rangers Avenue.

Source: Google Street View, 2024.

2.3.2 13 Rangers Avenue, Mosman

13 Rangers Avenue is a modern house that was built around 2005. Unlike the neighbouring houses, the three storey house fronts Rangers Avenue, and has garage and pedestrian access via Rangers Avenue. A decorative stone clad wall frames the garage and pedestrian entrance along Rangers Avenue.



Picture 12 The modern building at 13 Rangers Avenue.

Source: Urbis, 2025.



Picture 13 The decorative contemporary rock wall of 13 Rangers Avenue.

Source: Urbis, 2025.

2.3.3 15 Rangers Avenue, Mosman

15 Rangers Avenue is a modern two-storey house completed in 2017. The house fronts Rangers Avenue, with pedestrian access via stone steps. It is separated from the adjoining 17 Rangers Avenue by a concrete wall. At the street level, a stone wall with tiered landscaping blocks view of the lower level of the house.



Picture 14 15 Rangers Avenue, with tiered landscaping, and stone steps.

Source: Google Street View, 2025.

2.3.4 17 Rangers Avenue, Mosman

17 Rangers Avenue is a Federation style building adjoining 15 Rangers Avenue. The house features a projected timbered gable and a tall chimney to the west of the gable. There is a large second storey extension and a modified second gable. Dense landscaping obscures much of the house from view.

At the street level, the house is accessed via a metal gate, with a metal fence adjoining the masonry wall of 19 Rangers Avenue.



Picture 15 17 Rangers Avenue (circled in green).

Source: Google Street View, 2024.

2.3.5 19 Rangers Avenue, Mosman

19 Rangers Avenue features a large full width modern extension that fronts Rangers Avenue, the original house built prior to 1943. The property includes a garage and rear access via Bloxsome Lane. The two-level modern extension boasts large glass windows facing Mosman Bay, and a skillion roof. The extension makes it difficult to see the original house, and difficult to discern any significant features of the house. The rear of the house has a secondary extension.



Picture 16 The modern extension identifiable from the earlier house.

Source: Urbis, 2025.



Picture 17 View towards 21 Rangers Avenue, 19 Rangers Avenue to the right.

Source: Urbis, 2025.

2.3.6 21 Rangers Avenue, Mosman

The topography of Rangers Avenue means that 21 Rangers Avenue sits in an elevated position above 19 Rangers Avenue. This two-storey house is finished in a Victorian style. The house has been altered and extended to the rear over time (see Section 3 below).

The primary façade features large bays windows on both the lower and upper floors, a verandah with decorative verandah railing, and decorative fretwork is situated to the east of the bay windows. The house has a double gable roof form, with the western elevation slightly more projected, giving the façade an asymmetrical appearance. Additionally, the house has two tall chimneys topped with terracotta pots. Some windows and joinery elements to the façade have been replaced.

A rock wall is located directly in front of the house, with a sandstone retaining wall built on top of it. Access to the house is via stone steps to the east of the house.



Picture 18 21 Rangers Avenue.

Source: Realestate.com.au, 21 Rangers Avenue, 2020.



Picture 19 The significant rock wall along Rangers Avenue, 21 Rangers Avenue above.

Source: Urbis, 2025.

2.3.7 23 Rangers Avenue, Mosman

23 Rangers Avenue is a single-storey Federation style house set back from the street. Constructed with red bricks, the primary façade features two bay windows facing Mosman Bay and the Sydney city skyline. The house has a hipped roof with a projected gable facing Rangers Avenue, finished in red tiles, and a tall chimney extending from the roof. An extension has been added to the rear of the house.

The house is accessed via a set of stairs carved out from the rock along Rangers Avenue. A sandstone block wall sits above the retaining wall, topped with a picket fence.



Picture 20 23 Rangers Avenue.

Source: Urbis, 2025.



Picture 21 Rock wall along Rangers Avenue, stairs to 23 Rangers Avenue to the left.

Source: Urbis, 2025.



Picture 22 Rock wall in the south-west corner of 23 Rangers Avenue.

Source: Urbis, 2025.

2.4 Divided Road

The following description of the Divided Road has been reproduced from the NSW State Heritage Inventory entry for the heritage item.

Divided roads in Mosman are of several kinds. First, streets which divide longitudinally so that they have one carriageway higher than the other, separated by a slope, an embankment, a retaining wall, landscaping, a median or a combination of these. A variant is the street which has the carriageways on the same level but with an embankment on one side and a cutting on the other, so that only the footways are different in height. Longitudinally-divided streets are usually formed more-or-less along the contours of the land; they sometimes combine both kinds of level-change in the same street, and the street may be straight or curved, giving further variations of the type. Secondly, there are streets which divide laterally, with an interruption somewhere along the length of the street. The interruption may be a retaining wall, a rockface, steps, a

landscaped bank, or a combination of all or some of these. Sometimes the streets on each side of the interruption have different names.¹

The Divided Road at Mosman has the carriageway on the same level with the rock face on the northern side of the street and embankment on the southern side.



Picture 23 Rangers Avenue Divided Road, Rangers Avenue.

Source: NSW State Heritage Inventory, LEP#1438.



Picture 24 Divided Road in front of subject site.

Source: Urbis, 2025.

2.5 'Steps' Bloxsome Lane

The following description of the 'Steps' has been reproduced from the NSW State Heritage Inventory entry for the heritage item.

The steps connecting differing levels of roads are of many diverse kinds. Some are carved into the sandstone bedrock which is the common substrate of Mosman. Some are constructed of sandstone blocks, with or without balustrading. Some are formed up in concrete, usually but not always mass concrete poured over the bedrock; sometimes rendered, sometimes not. Some steps are framed in carpentry using traditional hardwood components and forms, usually treads between strings, without risers. Most step flights have simple balustrading, sometimes of timber with posts supporting a diagonally-placed handrail and an intermediate rail; and sometimes of steel piping. Balustrading is usually painted, and occasionally timber treads have painted foreedges to increase their visibility at night. In many cases steps are flanked by landscaped areas or by walls or rockfaces.²

¹ NSW State Heritage Inventory, Divided Road LEP#1438, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2060425>.

² NSW State Heritage Inventory, 2025, 'Steps', <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2060052>.



Picture 25 'Steps' Bloxsome Lane.

Source: Urbis, 2025.



Picture 26 'Steps' Bloxsome Lane.

Source: Urbis, 2025.

2.6 Mosman's Character

The following description of Mosman's Character has been reproduced from the Mosman Residential Development Control Plan 2012.

The planning principles and controls in this Plan reflect the special characteristics and development issues facing Mosman. This Part details the unique qualities of Mosman and outlines why we need a DCP which responds to Mosman's landform and attributes.

Mosman has a rich cultural heritage created by the combination of harbour setting, dramatic topography, diverse vegetation, history and variety of built elements. These physical and cultural attributes create the unique and special character that is Mosman.

The harbour asset:

Mosman has a strong relationship with both Sydney and Middle Harbours. It is the spirit and backdrop of Mosman.

There are dramatic views of the harbour, making it a valuable and memorable community asset. The many bays, coves, inlets and beaches along the foreshore provide waterfront access and opportunities for recreation.

A varied topography:

Mosman's distinctive topography consists of plateaux and ridges grading from gentle to steep slopes forming valley sides. A significant north-south ridge runs from Spit Road in the north to Bradleys Head in the south. Another ridge runs in an east west direction from Middle Head joining the north-south ridge at the central Mosman plateau. These ridges create the predominant landform, define the major road corridors and afford harbour and city views.

Extending from the foreshore area are outcrops of land which are extensions of the ridges. The steep slopes generally comprise cliffs, terraces and rock outcrops. The slopes comprise cliffs and terraces, together with enclosed gullies and valleys formed around the natural drainage lines.

A wealth of views and vistas:

Views are available to and from most areas in Mosman due to the topography, particularly from the ridges and sloping foreshore areas. Views of Middle Harbour, Sydney Harbour and city skyline are widespread from private properties and are also afforded by public streets, walkways and spaces and through gaps between buildings.

Significant Rock faces and retaining walls:

Mosman's natural rock faces and sandstone retaining walls and cuttings are a significant part of the unique character of Mosman.

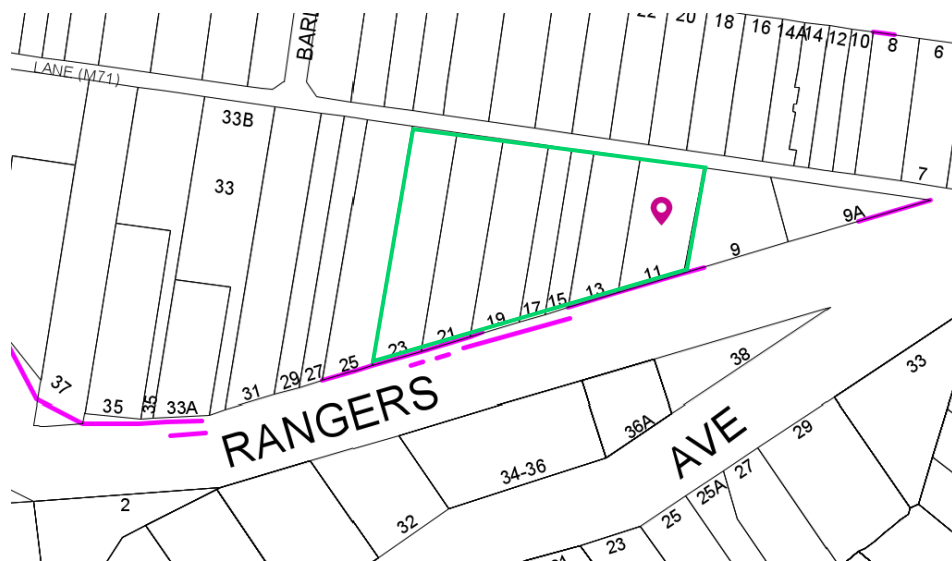


Figure 3 Map showing the location of significant rock walls (pink lines) in relation to the site (green outline).

Source: Mosman Council online mapping, 2025. Annotated by Urbis.

3 Historical Overview

This section provides a historical overview of the site and the surrounding context.

3.1 Area History

European settlement commenced in Mossmans Bay, later Mosman, in 1814 with the establishment of small farms around the region of Hunter's Bay. By all accounts, the landscape of Mosman was largely characterised by dense forests, swampy, brackish marsh and rocky foreshore outcrops. Situated across Sydney Harbour, Mosman provided an early albeit far reaching outpost for settlers seeking to expand farming and later whaling operations in the regions surrounding creek lines and inlets throughout Mosman.³

The first grant of 40 acres in the area was given to Joseph Moore in September 1833. The 40 acres was approximately an area of land that is bounded by Bloxsome lane to the north, Archbold Road to the east, Rangers Avenue to the south-east and Spofforth Street to the west. The land reportedly was largely undeveloped at this time.



Figure 4 1860 map of the Parish of Willoughby, showing Joseph Moore's 40-acre land grant.

Source: HLRV, Parish of Willoughby.

In 1845 Moore's estate has been allocated for auction as insolvent estates, Oswald Bloxsome purchased the land in 1866. Bloxsome cleared the land of timber in the western portion of the estate before establishing a large residential dwelling later named as 'The Rangers'. Architect John Fredrick Hilly built Bloxsome's dwelling

³ Australian Town and Country Journal, 3 June 1914, 'The Beautiful Suburb of Mosman'

which was utilised as a temporary residence overlooking Mosman Bay.⁴ This dwelling was later demolished in 1914.⁵

By 1888 Bloxsome sold the estate to Tom Bradbury Wilkinson, James Murray and Edward Millett who were each affiliated with the Rangers Estate Land Company Ltd and were established as tenants in common. Less than 2 years later, the land would be sold for residential subdivision. The first of these subdivisions occurred from 1890, retaining the borders of Moore's original land grant, allocating the present subject area into lots 38,39,40 and 41. Settlement in the wider Mosman area was generally slow until the construction of the Sydney Harbour Bridge in the 1930's. A subdivision map of Holt's Estate, 1902, indicates that two established dwellings had been constructed on the site by this period.

The Rangers Estate Land Company controlled much of the Rangers Estate until 1912, when the remaining lots were taken over by the Bank of New South Wales. The Bank sold the remaining lots, the last lot was sold in 1923.⁶ Rangers Avenue initially started as an access road across the creek to 'The Rangers', the avenue was carved around to avoid large rocks. The Avenue was named in 1886 by Richard Harnett Jnr, however it was renamed Norris Street in 1904, but changed back to Rangers Avenue in 1916.⁷

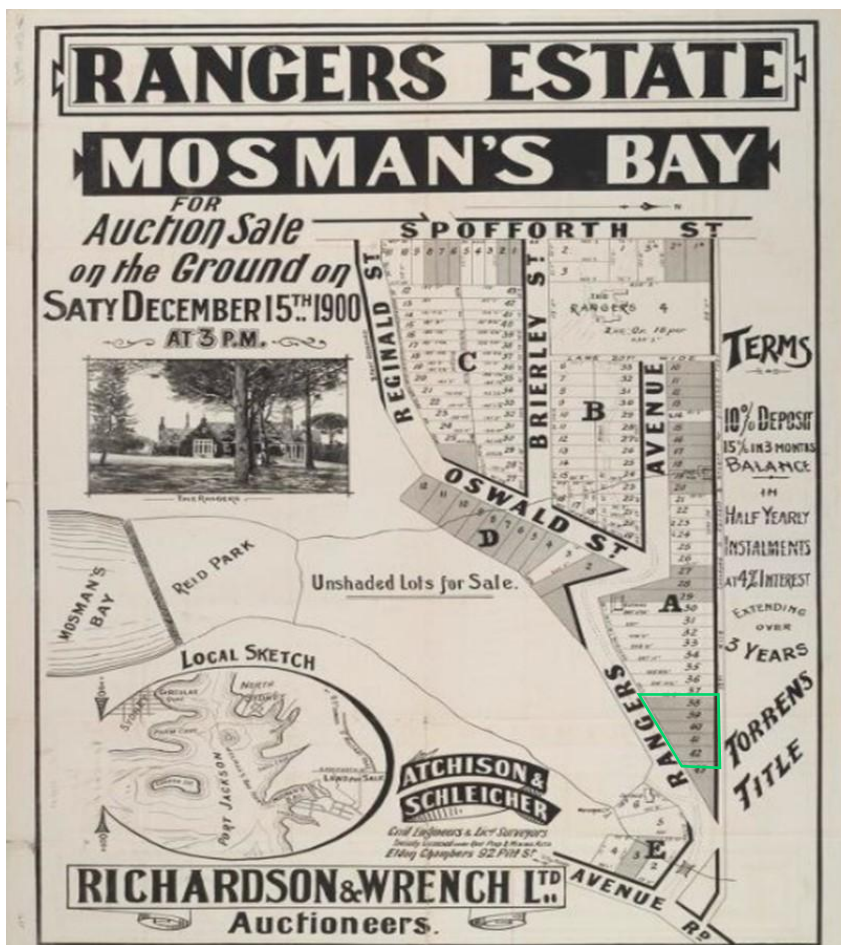


Figure 5 Subdivision plans for 'Rangers Estate' Mosman's Bay c.1900. The location the subject site is outlined in green. The shaded lots indicate lots not were not for sale at the time.

⁴ Ibid.

⁵ Mosman Historical Society, 2024, The Rangers Estate, Mosman, Pam Lofthouse – Mosman Historical Society, <https://mosmanhistoricalsociety.org.au/>

⁶ Ibid.

⁷ Ibid.

Source: State Library of NSW, item number Map/FLSP 1645.

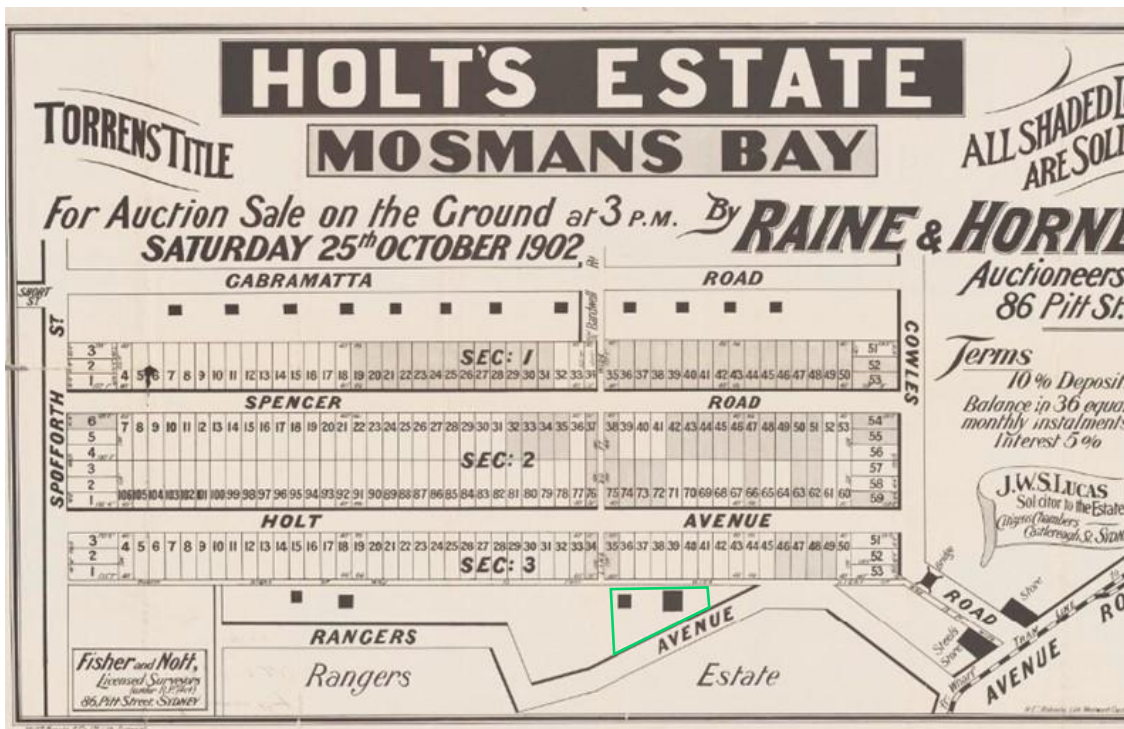


Figure 6 Holts Estate subdivision plans c.1902. The approximate location of the subject site is outlined in green.

Source: Trove, item number Map FLSP/1645.

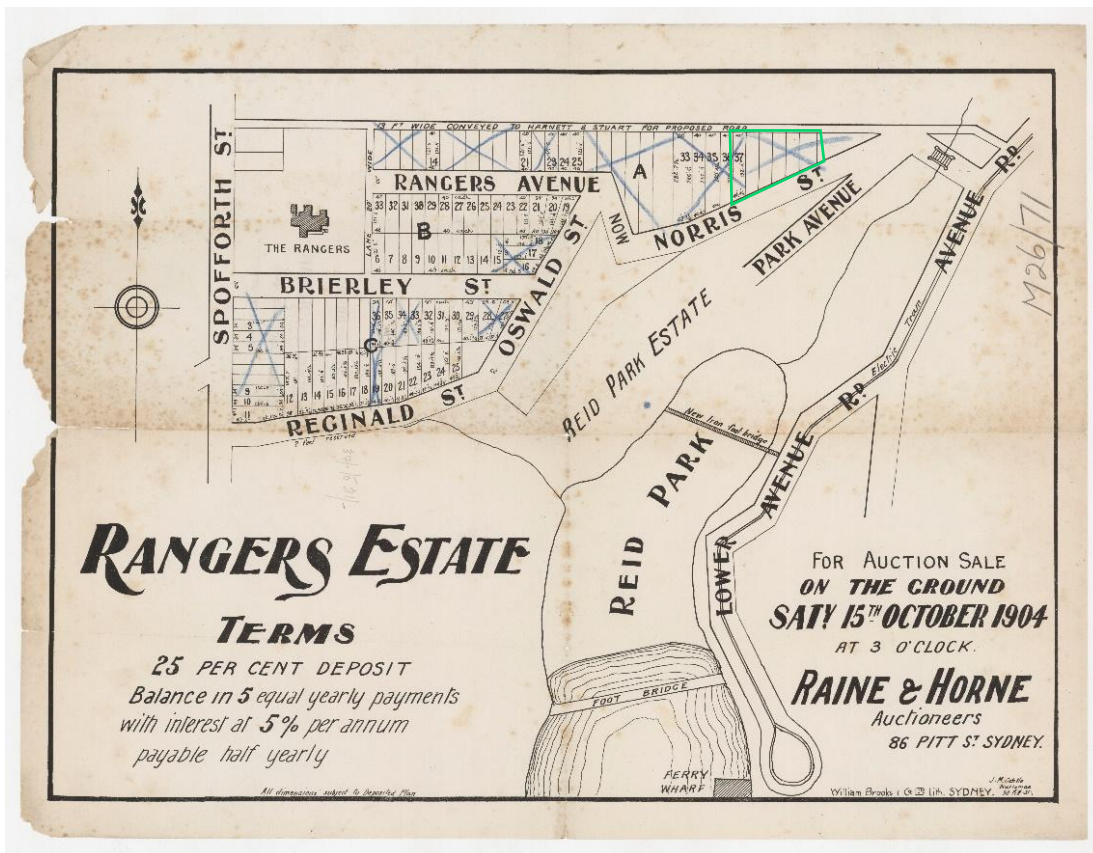


Figure 7 Rangers Estate 1904 subdivision plans that show when Rangers Avenue was changed to Norris Street.

Source: NSW State Library, Record number 072-Z/SP/M26/71.



Figure 8 Extract of 1980 cadastral map of Mosman, showing the site subdivisions.

Source: HLRV, map reference U1852-811.

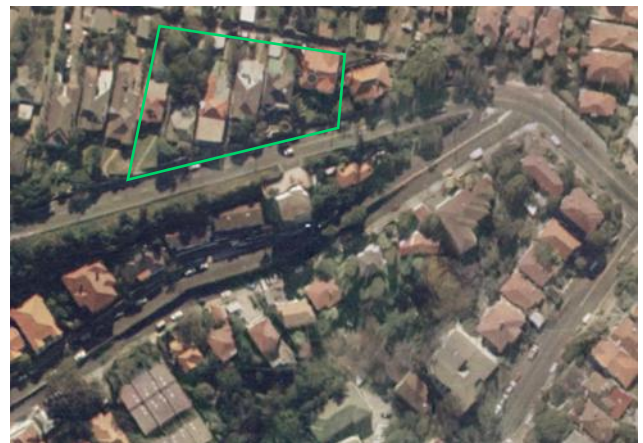
Historical aerials of the subject site reveal six residential dwellings in 1943, 1986 and 2005. This indicates that the current 15 and 17 Rangers Avenue, were one large house. Extensions to all the dwellings occurred over time. By 1986, 19 Rangers Avenue had an extension fronting Rangers Avenue, which obscures the original house seen in 1943. By 2005, the house at 13 Rangers Avenue had been replaced with a newer house. Additionally, 21 Rangers Avenue had been altered and extended with a double gable roof legible in 2005 that was not present in 1943.

In late 2017, the larger house at 17 Rangers Avenue was partially demolished. A modern house was built that became 15 Rangers Avenue was completed in 2018.



Picture 27 1943 aerial of the subject site (green outline), showing 6 houses.

Source: NSW Historical Imagery, 2025.



Picture 28 1986 aerial of the subject site (green outline), showing 6 houses, and alterations to 19 Rangers Avenue.

Source: NSW Historical Imagery, 2025.



Picture 29 2005 aerial of the subject site showing new house at 13 Rangers Avenue.

Source: NSW Historical Imagery, 2025.



Picture 30 2017 aerial of the subject site, showing empty lot at 15 Rangers Avenue.

Source: Nearmap, 2025.

3.1.1 Land Title Search

Date	Details	Reference
18 September 1833	Primary Application To Joseph Moore (Shipowner) Land 40 acres	PA1124
19 January 1866	Conveyance From Joseph Moore To Oswald Bloxsome (City of Sydney Esquire) Land 40 acres	Vol. 14. Folio 19
16 August 1886	Conveyance From - Oswald Bloxsome To - Tom Bradbury Wilkinson (City of Sydney Esquire), James Murray, Edward Millett (tenants in common) Land 39 acres, 1 rood, 17 and a half perches	Vol. 801. Folio 165
6 April 1888	Conveyance From - Tom Bradbury Wilkinson (City of Sydney Esquire), James Murray, Edward Millett (tenants in common) To - The Rangers Estate Land Company Ltd. Land 39 acres, 1 rood, 17 and a half perches	Vol. 876. Folio 52
1890	Land subdivided from c.1890 for residential use.	
27 November 1905	Conveyance From - Rangers Estate Land Company Limited. To - Walter Henry Gors Land - Lots 36 and 37 of Section A 2509	Vol. 1654. Folio 76

23 February 1906	Conveyance From – Walter Henry Gors To – Emma Jane Hall Land – Lot 37 of Section A 2509 (present day Lot 37 A DP2509 – 23 Rangers Avenue). Land Title transferred in 1944, and again in 1952. George and Mary Whitehouse joint tenants in 1963.	Vol. 1674. Folio 77
07 November 1930	Conveyance To – Leslie Alfred Dobson Land – Lot 41 of Section A DP2509 (41/A/DP2509 – 13 Rangers Avenue), 18 ½ perches	Vol. 4448. Folio 240

3.2 Divided Road

The following historical overview of the Divided Road has been reproduced from NSW State Heritage Inventory entry for the heritage item.

The earliest streets of Mosman were formed along the ridges and were thus long and winding. Contrasting with these were the roads bounding the first residential subdivisions; these were straight streets separating historic land holdings from one another. A third type followed the contours of the land between the ridges and the waterfront. As subdivision burgeoned and development intensified, supplementary access roads multiplied, criss-crossing the earlier alignments and making complicated patterns on the landscape. The hilly terrain made it necessary for many streets to have their carriageways at different levels; or produced streets with an embankment on one side and a cutting on the other; or compelled streets to slope steeply; or, surprisingly commonly, prevented the actual formation of streets which had been laid out only on paper. Modes of transport have also been historical factors.

A horse and rider could handle terrain impossible for a horse-drawn carriage, while a carriage could negotiate irregular tracks that were impracticable for a motor vehicle. Bigger vehicles like buses and trams required gentler gradient curves which in some areas necessitated substantial cuttings and embankments. An incidental historical observation is that as technology developed, it became possible to build on and service very steep sites facing very difficult roads, making them attractive for subsequent development. All these historical factors have helped to shape Mosman's streets and the consequent character of the place.⁸

3.3 Mosman's Heritage

The following historical overview of Mosman's Heritage has been reproduced from the Mosman Residential DCP.

Mosman has a complex heritage created by the interplay of its harbour setting, topography, vegetation and built environment. These elements create the unique character and place values of Mosman. These elements have been recognised by the community and Council through the identification and preservation of those items in the LEP.

⁸ NSW State Heritage Inventory, Divided Road #I438,
<https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2060425>.

The area is characterised by a variety of domestic buildings built predominantly during the Federation and Inter War periods in a range of scales from semi detached dwellings to dramatic free standing mansions set in spacious grounds. Building development in the interwar period resulted in the construction of significant areas of Mediterranean, Spanish, Georgian revival and other identifiable architectural styles as well as small scale residential flat buildings. Residential development of the post war period is also rich and varied, including notable examples of the Sydney regional aesthetic and contemporary design, as well as medium density and high rise buildings.

Heritage conservation areas possess an identified level of unity and include features such as consistent building style, streetscape and setting. The values of these places are important for not only their group characteristics, but for protecting their qualities for the present community and future generations.⁹

⁹ Mosman Residential Development Control Plan 2012, Section 7 – The Townscapes–7.1 Mosman’s Character. PDF FILE.

4 Heritage Significance

4.1 What is Heritage Significance?

Before undertaking a listed heritage item, a property within a heritage conservation area, or a property located in proximity to a listed heritage item, it is important to understand the heritage values of the place and its broader heritage context. This understanding will underpin the approach to any proposed changes and identify what is important and why, and how these values can be protected. Statements of heritage significance summarise the heritage values of a listed heritage item – why it is important and why a statutory listing was made to protect these values.

4.2 Heritage Listings

The subject site is located within the Mosman Council Local Government Area (LGA). It is not located within a heritage conservation area nor are there any individually listed heritage items within the subject site under a statutory instrument. The subject site however is located within vicinity of the following heritage items:

- 'Divided Road' (LEP #1438), situated at Rangers Avenue Road Reserve (adjacent to 11-33 Rangers Avenue).
- 'Steps' Bloxsome Lane (LEP #1331).
- Holt Estate Heritage Conservation Area #C3 – adjacent to Bloxsome Lane.

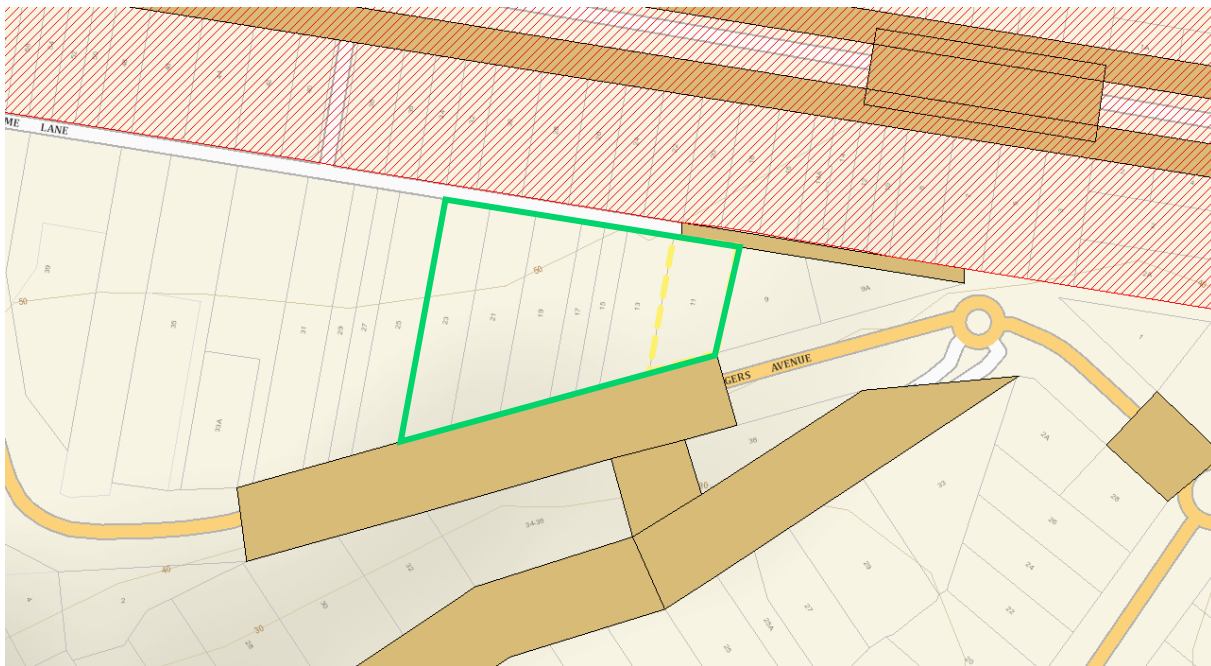


Figure 9 Heritage map showing the site outlined in green.

Source: NSW Planning Portal ePlanning Spatial Viewer, 2025.

4.2.1 Significant Rock Faces and Retaining Walls

Section 6.9 of the Mosman Residential DCP 2012 identifies significant rock faces on Rangers Avenue. However, the rock faces are not listed as heritage items under the Mosman LEP 2012 Schedule 5.

Mosman's natural rock faces and sandstone retaining walls and cuttings are a significant part of the unique character of Mosman.

In order to ensure the protection of these features and structures from inappropriate development, the planning controls in the Mosman Residential DCP have been put in place to protect the rock faces against development.¹⁰

4.2.2 Holt Estate Conservation Area

The Holt Estate HCA is adjacent to the north of the subject site. The HCA includes the northern side of Bloxsome Lane and extends further north to Prince Street.

The area slopes gently in a south easterly direction from Military Road down towards Mosman Bay. The gentle slope, as well as the consolidated ownership of the area allowed for the planned regular grid pattern of the streets.

The area comprises houses generally of similar scale and form, most of which would have been erected soon after subdivision in 1902. However, many of the houses in this conservation area have been modified. The modifications are chiefly the painting of face brickwork never intended to be treated this way, the erection of intrusive garages or carports mostly in front of houses, the concealment of the houses by high, opaque front fences, and the building of severe first-floor additions.

The character of the area is now greatly dependent upon the efficacy of the street plantings of plane and brush box trees in both roads, which to some degree conceal or ameliorate the effects of alterations and additions.

¹⁰ Mosman Residential Development Control Plan 2012, section 6.9 Significant rock faces and retaining walls, p.111.



Figure 10 Map of the Holt Estate HCA, showing significant public views. Subject site in green

Source: Mosman Residential Development Control Plan 2012, p.152.

4.3 Significance Assessment

There are generally four levels of heritage significance used in Australia: local significance, state significance, national significance and world significance. The Heritage Council of NSW has developed a set of seven criteria for assessing heritage significance, which can be used to make decisions about the heritage value of a place or item. To be considered for heritage listing for local significance, an item must meet at least one of the seven assessment criteria. To be considered for heritage listing for state significance, an item must meet at least two of the seven assessment criteria, or be considered by the Heritage Council of NSW to be of such particular significance under one criterion to warrant listing.

The following assessment of heritage significance has been prepared in accordance with the Heritage NSW 'Assessing Heritage Significance' guidelines (2023) to determine whether the subject site meets the requisite threshold for heritage listing and at what significance level.

Criterion A – Historic Significance

Significance Indicators

- ☐ Association with an event, or series of events, of historical, cultural or natural significance.
- ☒ Demonstration of important periods or phases in history.
- ☐ Association with important cultural phases or movements.

Significance Assessment

The dwellings that make up the subject site reflect the subdivision Rangers Estate that started in the 1890s and continued into the 1930s. However, Rangers Estate is not associated with any key historical events, and not considered unique or sufficient to meet the criteria for heritage listing.

- ☐ Demonstration of important historical, natural or cultural processes or activities.
- ☐ Symbolism and influence of place for its association with an important historical, natural or cultural event, period, phase or movement.

The site dwellings do not meet the criteria for heritage listing under this criterion.

Criterion B – Historical Association

- ☐ A key phase(s) in the establishment or subsequent development at the place or object was undertaken by, or directly influenced by, the important person(s) or organisation.
- ☐ An event or series of events of place over an extended period historical importance occurring at the place or object were undertaken by, or directly influenced by, the important person(s) or organisation.
- ☐ One or more achievements for which the person(s) or organisation are considered important are directly linked to the place or object.

Historical research has not identified any significant persons associated with the dwellings on the subject site, either as owners or occupants. Additionally, the research has not attributed the design or construction of the dwellings to any important architect or builder.

The dwellings do not meet the criteria for heritage listing under this criterion.

Criterion C – Aesthetic/Creative/Technical

- ☐ Recognition as a landmark or distinctive aesthetic natural environment.
- ☐ Recognition of artistic or design excellence.
- ☐ Represents a breakthrough or innovation in design, fabrication or construction technique, including design/technological responses to changing social conditions.
- ☐ Distinctiveness as a design solution, treatment or use of technology.
- ☐ Adapts technology in a creative manner or extends the limits of available technology.

13 and 15 Rangers Avenue are modern buildings, while 19 Rangers Avenue has a modern extension fronting Rangers Avenue that serves as a primary façade. The primary façade blocks any existing façade details of the original building. The other dwellings have been altered and modified over time. 21 and 23 Rangers Avenue illustrate generic and typical examples of Victorian and Federation styles, but not considered to be outstanding examples of their type meeting the criteria for individual heritage listing. More representative examples of these styles can be seen within the Holt Estate HCA.

The Statement of Significance of the adjacent Holt Estate HCA notes that the character of the HCA has diminished overtime due to the addition of garages, high fences and modifications to primary facades. The subject site reflects how such modifications and additions can diminish aesthetic qualities of architectural styles.

The site dwellings do not meet the criteria for heritage listing under this criterion.

Criterion D – Social, Cultural and Spiritual

- ☐ Highly regarded by a community as a key landmark (built feature, landscape or streetscape) within the physical environment.
- ☐ Important to the community as a landmark within social and political history.

Desktop research has not identified that the dwellings demonstrate particular importance as a landmark.

The site dwellings do not meet the criteria for heritage listing under this criterion.

- ☐ Important as a place of symbolic meaning and community identity.
- ☐ Important as a place of public socialisation.
- ☐ Important as a place of community service (including health, education, worship, pastoral care, communications, emergency services, museums).
- ☐ Important in linking the past affectionately to the present.

Criterion E – Research Potential

- ☐ Comparative analysis
- ☐ Potential to improve knowledge of a little-recorded aspect of an area's past or to fill gaps in our existing knowledge of the past.
- ☐ Potential to inform/confirm unproven historical concepts or research questions relevant to our past.
- ☐ Potential to provide information about single or multiple periods of occupation or use.
- ☐ Potential to yield site-specific information that would contribute to an understanding of significance against other criteria.

There is no evidence to suggest further investigation of the site would further an understanding of the historical period.

This report does not assess archaeological potential. However, a Preliminary Historical Archaeological Assessment (PHAA) prepared for the subject site identified no potential archaeological resources within the subject site.¹¹

The site dwellings do not meet the criteria for heritage listing under this criterion.

Criterion F – Rare

- ☐ Rare surviving evidence of an event, phase, period, process, function, movement, custom or way of life in an area's history that continues to be practised or is no longer practised.
- ☐ Evidence of a rare historical activity that was considered distinctive, uncommon or unusual at the time it occurred.
- ☐ Distinctiveness in demonstrating an unusual historical, natural, architectural, archaeological, scientific, social or technical attribute(s) that is of special interest.
- ☐ Demonstrates an unusual composition of historical, natural, architectural, archaeological, scientific, social or technical attributes that are of greater importance or interest as a composition/collection.

The subject site features a mix of typologies that are common in the Mosman LGA, with similar dwellings also found in the Holt Estate HCA.

The site dwellings do not meet the criteria for heritage listing under this criterion.

Criterion G – Representative

¹¹ Urbis 2025, Preliminary Historical Archaeological Assessment – 13 – 23 Rangers Avenue, Mosman. Draft report prepared for this SSDA.

☐ A class of places or objects that demonstrate an aesthetic composition, design, architectural style, applied finish or decoration of historical importance.

☐ Representative of a class of places that demonstrate a construction method, engineering design, technology, or use of materials, of historical importance.

☐ Representative of a class of places that demonstrate an historical land use, environment, function, or process, of historical importance.

☐ Representative of a class of places that demonstrates an ideology, custom or way of life of historical importance.

While 21 and 23 Rangers Avenue are recognisable as Victorian and Federation style houses, they are not considered good or highly representative examples of their type.

Furthermore, the dwellings on the subject site have been modified over time, with many having undergone alterations and extensions that have changed the original appearance.

The site dwellings do not meet the criteria for heritage listing under this criterion.

4.4 Statements of Significance

4.4.1 The Site Statement of Significance

The subject site dwellings being 11-23 Rangers Avenue, Mosman have been assessed as not meeting the criteria for heritage listing. The dwellings are a mixture of modern dwellings and generic and modified examples of Federation and Victorian dwellings. They do not demonstrate particular historical associations or aesthetic merit, and their typologies are common in the Mosman area.

A Mosman Heritage Review conducted in 2007, which reviewed 24 properties, did not recommend or identify any of the dwellings on the subject site for heritage listings.¹² Furthermore, Mosman's Architectural Heritage report did not identify any of the dwellings on the subject site as notable examples of the Federation and Victorian style seen across the Mosman LGA.¹³

4.4.2 Vicinity Heritage Items Statement of Significance

The following table outlines the established statements of significance for relevant heritage items in the vicinity of the subject site.

Vicinity Heritage Item	Established Statement of Significance
Rangers Avenue 'Divided Road' (Item #438)	<i>Mosman's divided roads are integral to the Municipality's visual character and sense of place. Built as a utilitarian response to the steep harbourside topography, they reflect, in their fabric and construction technology, the development of Mosman's suburban structure. The large collection of these features makes Mosman instantly and uniquely recognisable.</i>

¹² Paul Davies Pty Ltd Architects Heritage Consultants, 2007, Mosman Heritage Review, <https://mosmanhistoricalsociety.org.au/pages/history-resources>.

¹³ Robert Staas, 2008, Mosman's Architectural Heritage, <https://mosmanhistoricalsociety.org.au/pages/history-resources>.

	<i>This item is aesthetically representative locally. This item is historically representative locally.¹⁴</i>
Bloxsome Lane 'Steps' (Item #I331)	<i>The pedestrian steps of Mosman are integral to the visual character and sense of the place. Built as a utilitarian response to the steep harbourside topography the large collection of steps and associated paths reflect, in their fabric and construction, the development of Mosman's suburban structure. In general they are pleasing visual features in the streetscape. They are among the features that make the suburb instantly recognisable as Mosman.</i> <i>This item is aesthetically representative locally.¹⁵</i>
Holt Estate Conservation Area #C3	<i>The Holt Estate Conservation Area is a complete early subdivision containing a great many buildings from its original residential development. Its significance has been diminished by modifications which have catered to the requirements of individual owners' amenity at the cost of respecting and retaining heritage values.¹⁶</i>
Rangers Avenue Significant rock faces and retaining walls	<i>Mosman's natural rock faces and sandstone retaining walls and cuttings are a significant part of the unique character of Mosman.</i> <i>In order to ensure the protection of these features and structures from inappropriate development, the following objectives and planning controls are in place consistent with the Rock Faces and Retaining Walls Study (2003).¹⁷</i>

¹⁴ NSW State Heritage Inventory, Divided Road.

¹⁵ NSW State Heritage Inventory, Steps #I331, <https://www.hms.heritage.nsw.gov.au/App/Item/ViewItem?itemId=2060052>.

¹⁶ Mosman Residential Development Control Plan 2012.

¹⁷ Ibid.

5 The Proposal

The proposed development of a part 6, part 7 storey residential flat building plus two levels of carparking at 11-123 Rangers Avenue, Mosman.

The proposed works includes the following:

- Demolition of the existing structures on the sites at 11-23 Rangers Avenue, Mosman.
- *The application seeks development consent for the demolition of existing buildings and the construction of a part 6, part 7 storey residential flat building plus basement carparking at 11 -23 Rangers Avenue, Mosman.*
- *Specifically, the SSDA seeks development consent for:*
- *Demolition of the existing structures on the sites at 11 -23 Rangers Avenue, Mosman.*
- *Construction of a residential flat building comprising:*
- *44 Residential apartments including 10 affordable housing apartments (equivalent to 15% of the proposed residential GFA).*
- *Communal open space and amenities.*
- *2.5 basement levels for car parking, bicycle parking, waste and plant.*
- *Vehicular access from Rangers Avenue, in the location of the current access (current vehicle access from Bloxsome Lane will be removed)*
- *Associated site landscaping.*

Urbis has been provided with drawing documentation prepared by Woods Bagot. This HIS has relied on these plans for the impact assessment include in Section 6. Extracts of the proposed plans are also provided overleaf. Full size plans should be referred to for detail.

Date	Drawing no.	Drawing Title	Revision
5 November 2025	DA0100	Sheet List	A
5 November 2025	DA0200	Development Summary	A
5 November 2025	DA1001	Location Plan	A
5 November 2025	DA1002	Site Analysis Plan	A
5 November 2025	DA1003	Site Plan	A
5 November 2025	DA1004	Setback Diagram	A
5 November 2025	DA1005	Demolition Plan	A
5 November 2025	DA1101	Render – View 01	A
5 November 2025	DA1102	Render – View 02	A
5 November 2025	DA1103	Render – View 03	A
5 November 2025	DA2008	Basement	A
5 November 2025	DA2009	Lower Ground – Rangers Avenue	A
5 November 2025	DA2010	Ground Level	A
5 November 2025	DA2011	Level 1	A
5 November 2025	DA2012	Levels 2-3	A
5 November 2025	DA2014	Levels 4-5	A

5 November 2025	DA2016	Level 6	A
5 November 2025	DA2017	Roof Plan	A
5 November 2025	DA3001	General Elevations – North	A
5 November 2025	DA3002	General Elevations – South	A
5 November 2025	DA3003	General Elevations – East	A
5 November 2025	DA3004	General Elevations – West	A
5 November 2025	DA3101	Short Section 01	A
5 November 2025	DA3102	Short Section 02	A
5 November 2025	DA3111	Long Section 01	A
5 November 2025	DA3112	Long Section 02	A
5 November 2025	DA5001	GFA	A
5 November 2025	DA5002	Deep Soil Calculation	A
5 November 2025	DA5003	Solar and Cross Ventilation Compliance	A
5 November 2025	DA5004	Storage Plans	A
5 November 2025	DA5005	Storage Schedule	A
5 November 2025	DA5010	LHA & Adaptable Layouts – Sheet 01	A
5 November 2025	DA5011	LHA & Adaptable layouts – Sheet 02	A
5 November 2025	DA5030	Height Plane Diagram	A
5 November 2025	DA5031	Height Plane Sections	A
5 November 2025	DA5032	Height Plane Sections	A
5 November 2025	DA5033	Height Plane Sections	A
5 November 2025	DA7130	Communal Open Space Shadow Diagrams	A



Figure 11 Extract of Demolition Plan.

Source: Woods Bagot, 2025, drawing no. DA1005.



Figure 12 Extract of the proposed Level 1 plan.

Source: Woods Bagot, 2025, drawing no. DA2011.



Figure 13 Extract of proposed Level 6 plan.

Source: Woods Bagot, 2025, drawing no. DA2016.



Figure 14 Extract of the general elevations – North (Bloxsome Lane).

Source: Woods Bagot, 2025, drawing no. DA3001.

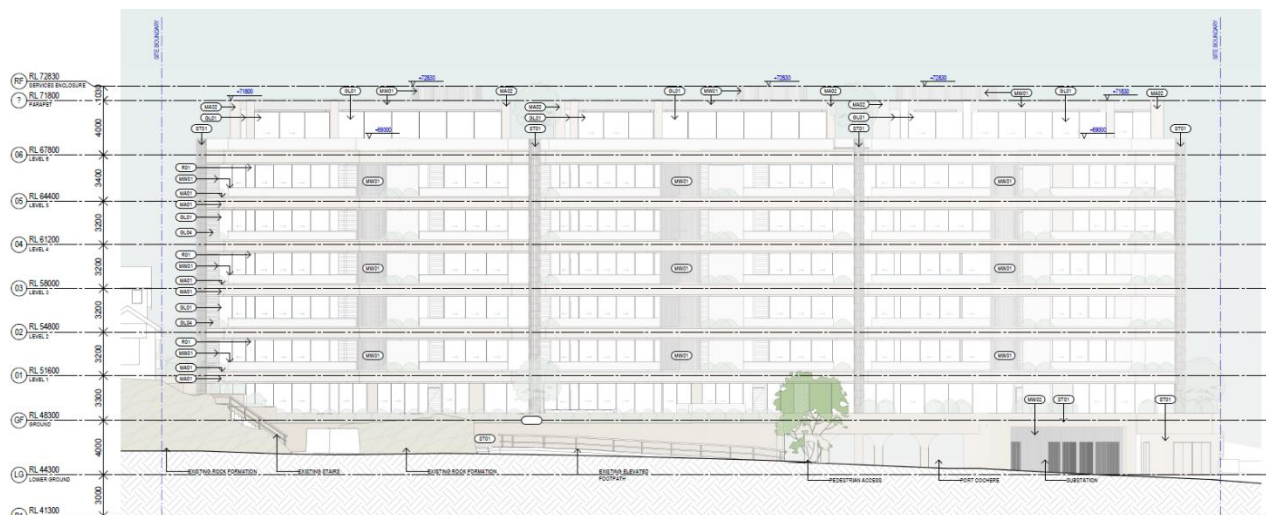


Figure 15 Extract of the General Elevations – South (Rangers Avenue).

Source: Woods Bagot, 2025, drawing no. DA3002.

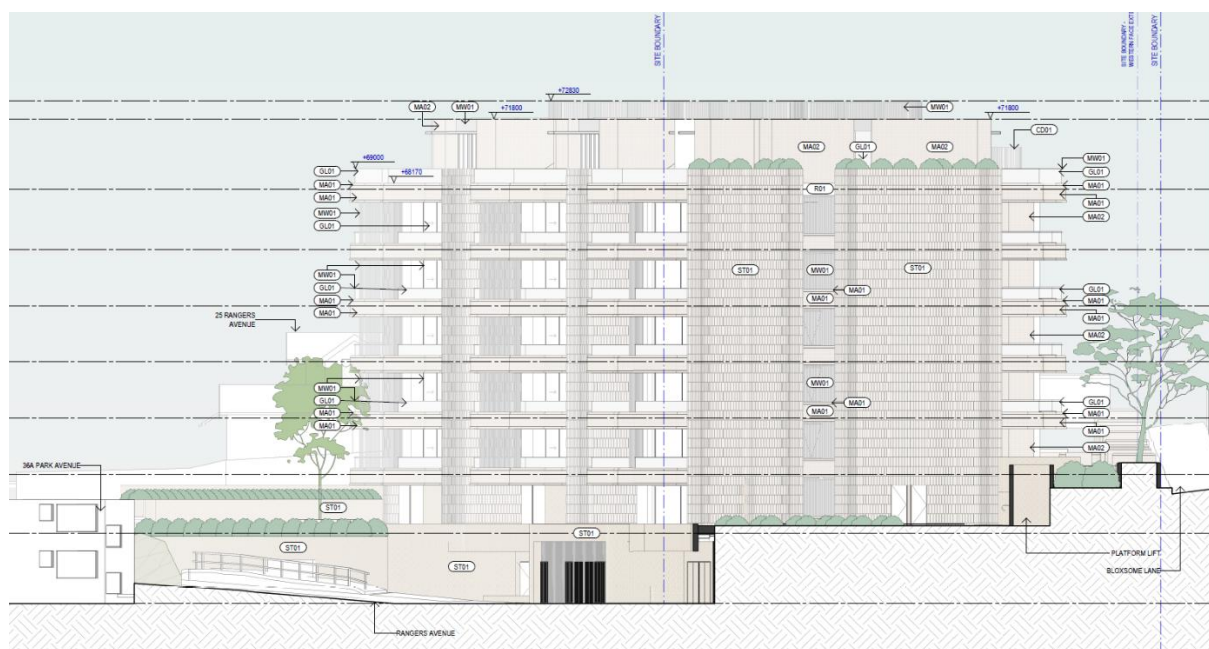


Figure 16 Extract of the General Elevations – East.

Source: Woods Bagot, 2025, drawing no. DA3003.

6 Impact Assessment

The following impact assessment has assessed the proposed works against the relevant provisions and controls of the Council's statutory and non-statutory planning controls as well as the Heritage NSW 'Statement of Heritage Impact' assessment guideline questions.

6.1 Relevant Planning Policies

The proposed development is in line with the LMR Housing Policy Zoning and Affordable Housing SEPP, which allows for additional density in residential zones within 400–800 metres walking distance from nominated town centres (in this case Cremorne Town Centre) and nominated train/light rail stations. The Low and Mid-Rise Housing Policy aims to create more housing choice for people at different stages of life. The NSW Government is committed to supporting a choice of well-designed and sustainable homes in well-located areas within walking distance of shops, services and frequent public transport.¹⁸

The main principles of the LMR Housing Policy Zoning and Affordable Housing SEPP are outlined below.

6.1.1 Low and Mid Rise Policing Zoning

New planning controls under the new Low and Mid-Rise Housing Policy came into effect on 28 February 2025, amending the Housing State Environment Planning Policy (SEPP) 2021 to allow for buildings of up to 17.5 height within 400–800 metres of designated town centres and stations. Cremorne town centre has been identified as one such town centre, to which the following controls apply:

Low and Mid-Rise Housing outer areas (400–800m from a nominated station/centre)

- Floor space ration: max 1.5:1.
- Height of building: max 17.5m.
- Storeys: max 4.
- No minimum lot size or width (LEP provisions switched off).

¹⁸ "Summary of key provisions: Low and Mid-Rise Housing Policy," Planning, NSW Government, accessed August 18, 2025, <https://www.planning.nsw.gov.au/policy-and-legislation/housing/low-and-mid-rise-housing-policy/summary-of-key-provisions>.

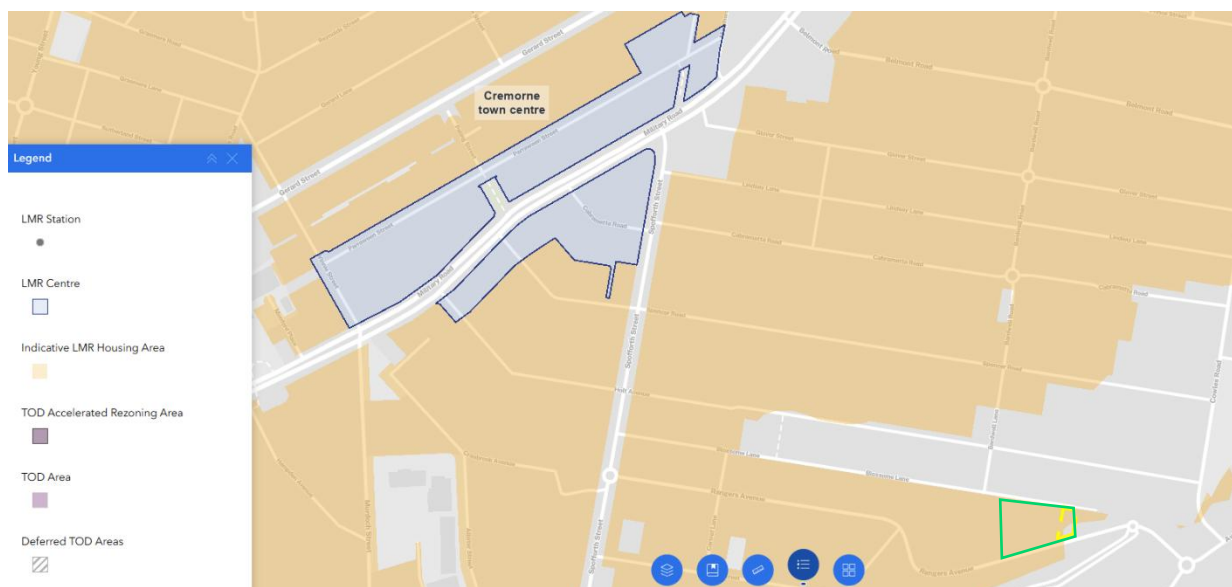


Figure 17 Extract from the LMR Viewer, showing the subject site indicated in green. Note the relation of the site to the nominated Cremorne town centre.

Source: LMR Viewer spatial portal, 2025.

https://spatialportal.dpie.nsw.gov.au/portal/apps/experiencebuilder/experience/?_gl=1%2Aivkovd%2A_ga%2AMTA3NzM4Nzk5MC4xNzI1NjAzNDU1%2A_ga_EM0GYT3QMX%2AMTc0MDQ1OTcxMS4zLjAuMTc0MDQ1OTcxNS41Ni4wLjA.&id=c53d5767b677454c8a26d6790a296bc2

6.1.2 Affordable Housing SEPP

Under the NSW Affordable Housing SEPP, a bonus of up to 30% of the maximum Floor Space Ratio (FSR) and building height is permissible if at least 10–15% of the Gross Floor Area is designated for affordable housing in a residential flat building.¹⁹ Accordingly, this allows for an increase of 30% to the designated FSR and heights established by the LMR zoning policy that applies.

6.2 Mosman Local Environmental Plan 2012

The table below provides an impact assessment of the proposal against the relevant clause for heritage conservation in the Mosman LEP.

Clause	Response
1. Objectives The objectives of this clause are as follows: a. To conserve the environmental heritage of Mosman,	The subject site does not include any listed heritage items, and the dwellings are not assessed to be of heritage significance. The subject site is not located within a Heritage Conservation Area. This HIS considers the proposed works with regard to potential heritage impacts on the vicinity heritage items including:

¹⁹ “In-fill affordable housing – Housing SEPP,” Planning, NSW Government, accessed August 28, 2025, <https://www.planning.nsw.gov.au/policy-and-legislation/housing/housing-sepp/in-fill-affordable-housing#:~:text=The%20reforms%20include%20building%20and%20shop%2Dtop%20housing.>

- b. To conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views,
- c. To conserve archaeological sites,
- d. To conserve Aboriginal objects and Aboriginal places of heritage significance.

- 'Divided Road' along Rangers Avenue #I438.
- 'Steps' Bloxsome Lane #I331.
- Holt Estate Heritage Conservation Area #C3.
- Significant rock wall and retaining walls along Rangers Avenue.

The proposed residential flat buildings are located within the 400–800 metre 'outer area' of a designated LMR. The Affordable Housing SEPP allows for a 30% uplift on top of the LMR controls. The proposed development is acceptable under the LMR Controls. However, the proposed development does have an impact on the character of the vicinity Holt Estate HCA.

The character and scale of the Holt Estate is predominantly low-density (one – two storeys), Victorian and Federation style houses. Majority of the houses in the HCA have garages fronting the houses. The proposed development is part 6, part 7 storey residential development, which is noticeably contemporary in appearance and higher than the residential buildings in the HCA. Impacts of the proposed development on the HCA are mitigated through architectural design, which follows the existing topography of the area.

The proposed works will have a minor impact on the nearby Holts Estate HCA as the site is located to the rear of the large HCA outside of principal view lines. The significant public views and vistas of the Holt Estate HCA Townscape identify the key view as being from Rangers Avenue across to Mosman Bay.

A small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest scale, predominate and representative part of the significant rock wall along 23–15 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.

2. Requirement for consent

Development consent is required for any of the following:

- a. Demolishing or moving any of the following or altering the exterior of any of the following (including, in the case of building, making changes to its detail, fabric, finish or appearance)–
 - i. A heritage item,
 - ii. An Aboriginal object,
 - iii. A building, work, relic or tree within a heritage conservation area,
- b. Altering a heritage item that is a building by making structural changes to its interior or by making changes to anything inside the item that is specified in Schedule 5 in relation to the item,
- c. disturbing or excavating an archaeological site while knowing, or having reasonable cause to suspect, that the disturbance or excavation will or is likely to result in a relic being discovered, exposed, moved, damaged or destroyed,
- d. disturbing or excavating an Aboriginal place of heritage significance,
- e. erecting a building on land–
 - i. on which a heritage item is located or that is within a heritage conservation area, or
 - ii. on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance,
- f. subdividing land–
 - i. on which a heritage item is located or that is within a heritage conservation area, or
 - ii. on which an Aboriginal object is located or that is within an Aboriginal place of heritage significance.

Consent is required for works in the vicinity of heritage items in accordance with the LEP.

4 Effect of proposed development on heritage significance

The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned. This subclause applies regardless of whether a heritage management document is prepared under subclause (5) or a heritage conservation

A detailed heritage impact assessment has been undertaken in the following sections of this report. As outlined above, the proposed works are permissible under the LMR controls and the Affordable Housing SEPP. The increased height is acceptable as part of the 30% uplift control over the site. Key aspects of the proposal assessment are listed below:

- The subject dwellings have been assessed as not meeting the criteria for heritage listing (See

management plan is submitted under subclause (6).

Section 4.3 for more details). Two of the dwellings (13 & 15) are completely modern dwellings, 19 Rangers Avenue has a modern extension on the front that obscures any original features from view. The remaining dwellings are generic examples of their periods of architecture, a typology common in the Mosman LGA. Therefore, their demolition is supported from a heritage perspective.

- There are no proposed works to the vicinity heritage items. The design has been adapted as per the heritage advice provided by Urbis to ensure a large portion and most predominate part of the significant rock wall along 23-17 Rangers Avenue is not impacted to accommodate vehicular access.
- A small portion (around half a metre) of the rock wall in front of 11 Rangers Avenue is proposed for removal. However, this small section is not a representative example of the rock wall, and is being removed to allow pedestrian access into the residential development. The larger portion outside 23-17 is being retained.
- The increase in the height plane has an acceptable level of impact the Holt Estate HCA. The proposed development has been designed to follow the existing topography of the site that slopes to the south. The proposed development is permissible under LMR controls.
- The proposed development has appropriate levels of setbacks to Rangers Avenue and Bloxsome Lane that increases to the west. The setbacks to Bloxsome Lane and vehicular access proposed at Rangers Avenue reduces the impacts on the HCA.
- The proposed development will not impact identified significant public views identified on the map across to Sydney Harbour and Mosman Bay to the city skyline.
- The stepped design of the proposed development reflects the existing site setbacks and topography to Rangers Avenue. The design also allows for the retention of a significant portion of the rock wall.
- The proposed finish will be of neutral palette, while being noticeably contemporary. The use of communal spaces and flat roof level enhances views towards Sydney Harbour.

5 Heritage Assessment

The consent authority may, before granting consent to any development—

- a. on land on which a heritage item is located, or
- b. on land that is within a heritage conservation area, or
- c. on land that is within the vicinity of land referred to in paragraph (a) or (b),

require a heritage management document to be prepared that assesses the extent to which the carrying out of the proposed development would affect the heritage significance of the heritage item or heritage conservation area concerned.

This heritage impact statement has been prepared to assist the consent authority in their determination and to assess the potential heritage impacts of the proposed works. This heritage impact statement satisfies the requirement under this clause.

6.3 Mosman Residential Development Control Plan 2012 (amended December 2024)

The table below provides an impact assessment of the proposal against the relevant controls for conservation in the Mosman Residential DCP.

The Mosman Residential Development Control Plan 2012 applies to development proposed on land in Mosman that is zoned residential under the provisions of Mosman Local Environmental Plan 2012 being:

- R2 Low Density Residential.
- R3 Medium Density Residential.
- C4 Environmental Living.

The site is zoned as a R3 Medium Density Residential area. Therefore, the Mosman Residential DCP applies.

Clause	Response
Heritage Conservation	
O1. To have a heritage item or a significant building within a conservation area retained and conserved.	There are no works proposed to the vicinity heritage items or the Holts Estate Heritage Conservation Area. The proposed works will have a minor impact on the significant rock wall. A small section (about half a metre) of the significant rock wall is being proposed. However, this section is not a representative example, the larger section is being retained.
O2. To have the streetscape context and curtilage of heritage items and conservation areas maintained.	The vicinity heritage items, including the Rangers Avenue Divided Road, and the Bloxsome Lane 'Steps' are being retained and not altered. Additionally, the significant rock wall is being retained expect for a section to number 11 Rangers Ave. A small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new

development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest scale, predominate and representative part of the significant rock wall along 23-15 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.

The proposed works do not impact views to and from the vicinity heritage items. The existing dwellings do not offer views from the Holt Estate HCA towards Mosman Bay or the Sydney city skyline. The significant public views and vistas of the Holt Estate HCA Townscape identify the key view as being from Rangers Avenue across to Mosman Bay.

O3. To have the streetscape character of a conservation area maintained through appropriate design, built form, architectural style and landscaping and to ensure any infill development also respects the character of the streetscape.

The site is not in a conservation area.

O5. To have any works undertaken with a proper knowledge of the heritage significance of the heritage significance of the item or conservation area.

The site is not in a conservation area or individually listed.

The significance of the heritage items is set out in section 4 and an understanding of the historical context is informed by desktop historical analysis.

O6. To have new infill developments within conservation areas or adjacent to heritage items which are sympathetic to and do not mimic the established character.

The proposed work is not within an HCA, and does not detract from the established character of the adjacent heritage items, including the Divided Road and Steps on Bloxsome Lane.

A small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest

scale, predominate and representative part of the significant rock wall along 23-15 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.

A new boundary wall is proposed, which will be consistent with the materiality and palette that complements the sandstone rock wall and integrates the existing topography.

Potential impacts on the HCA have been mitigated through sufficient setbacks along Bloxsome Lane, and by having vehicular access via Rangers Avenue. Reducing the amount of vehicles accessing the narrow single lane of Bloxsome Lane reduces the potential physical impacts (vehicular noise impacts) on the houses in the HCA. The setbacks allow for a separation between the modern development and the character of the HCA.

The existing topography of the subject site reduces the impacts of the increased height of a part 6 and part 7 storey building. The natural slope to the south reduces the impacts of the identified significant public views and vistas.

P12. New development need not seek to replicate period details of original buildings, but rather, respect the form and scale of, and be sympathetic to, the immediate area. Contemporary design for additions and infill development is encouraged.

The proposed development does not mimic or replicate details of significant buildings within the Mosman LGA or the dwellings within the adjacent Holt Estate HCA.

The proposed development is contemporary in design.

P25. New Infill developments should respect the architectural character of the heritage item/s or the important character of the conservation area. Design should be in a similar scale and proportion to the townscape area character, be sympathetic to the heritage item, and not dominate or overwhelm the item/s of importance.

The proposed work is not within an HCA and therefore is not infill development.

As noted above, the proposed development is permissible under the LMR controls and Affordable Housing SEPP controls. Only one section of the proposed development extends beyond the height plane, and this is limited to a partial section of the roof in the south-eastern corner of the site where the topography is higher in the east. The flat roof design effectively mitigates further increases to the height plane.

P26. Do not replicate or mimic design features of the heritage item/s in the vicinity. New development should be clearly distinguishable from older development.

The proposal is apparent as a contemporary infill development for the reasons stated above.

Significant rock faces and retaining walls

O1. To have Mosman's significant rock faces and retaining walls protected from inappropriate development.

The significant rock wall along Rangers Avenue, directly adjacent to the subject site, is mostly being retained as part of the proposed development. The design has been carefully executed with Urbis heritage advice to ensure that the wall is not impacted.

A small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest scale, predominate and representative part of the significant rock wall along 23-17 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.

The existing stairs cut into the rock wall adjacent to 23 Rangers Avenue are being retained, continuing to allow for pedestrian access to the site from Rangers Avenue.

P1. No excavation of, or other works to, rock faces or retaining walls identified as significant in the Rock Faces and Retaining Walls Study or subsequent study, and on the Significant Rock Faces and Retaining Walls Map as updated from time to time, is allowed, except under special circumstances.

A small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest scale, predominate and representative part of the significant rock wall along 23-17 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.

P2. Special circumstances should be considered when the following are met: a. There are other existing openings into the rock face/wall and additional openings would be consistent with the approach; b. Any excavation would not detract from the visual contribution of the rock face/wall in its context; and c. The excavation would not adversely affect the setting of sites that are highly visible from the harbour or public reserves.	The vehicular access for the proposed development is in a location of existing openings and in a section where the rock wall is not present. The opening to 11 Rangers Road is to a very low section (less than half meter) the larger section outlined in the photographs at the executive summary are being retained and conserved. Due to the low scale the impact is assessed as minor. As per criteria A, there are other openings in the wall and vehicular access has been carefully designed with Urbis advice to utilise these existing openings. The proposed alteration does not adversely affect setting of view of the wall as a whole as per criteria c.
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6.4 Heritage NSW Guideline Considerations

The table below provides an impact assessment of the proposal against the relevant questions posed in Heritage NSW's *Guidelines for preparing a statement of heritage impact* (2023).

Provision	Response
Works adjacent to a heritage item or within the heritage conservation area (listed on an LEP) <i>Will the proposed works affect the heritage significance of the adjacent heritage item or the heritage conservation area?</i> <i>Will the proposed works affect views to, and from, the Interpretation heritage item? If yes, how will the impact be mitigated?</i> <i>Will the proposed works impact on the integrity or the streetscape of the heritage conservation area?</i>	The proposed development will not impact views to and from the vicinity heritage items. These heritage items, a road and stairs, are not affected by the development. Views towards Mosman Bay, the broader Sydney city skyline, and partial views of the Sydney Harbour Bridge will remain unaffected as identified on the Holt conservation area view mapping. The proposed development enhances the view from Rangers Avenue towards Mosman Bay and Sydney through its stepped design of the primary façade, flat roof and communal spaces that open up the view corridor. The existing dwellings currently block views of Mosman Bay from the south-facing houses on Bloxsome Lane that are part of the HCA. The existing dwellings are a mix of typologies and setbacks, while the proposed development offers a consistent design with setbacks that enhance views and provide opportunities for communal spaces and landscaping to enrich the streetscape. The proposed development retains a large section of the significant rock wall adjacent to the subject site. To accommodate vehicular access via Rangers Avenue instead of Bloxsome Lane, the development has been adapted to utilise the existing cut/opening along the wall near 13 and 11 Rangers Avenue in accordance with Urbis heritage advice thereby mitigating any impact on the rock wall. However, a small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone

blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest scale, predominate and representative part of the significant rock wall along 23-15 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.

The character and scale of the Holt Estate is predominantly low-density (one – two storeys), Victorian and Federation style houses. Majority of the houses in the HCA have garages to the rear of the houses fronting the lane. The proposed development is part 6, part 7 storey residential development, which is noticeably contemporary in appearance and higher than the residential buildings in the HCA.

Impacts of the proposed development on the HCA are mitigated through architectural design, which follows the existing topography of the area. The location of the site is behind the conservation areas which also has a lane creating a further setback and the development due to this is viewed in the background setting. The view lines and nearest road within of the HCA run east west while the site is located to the south so has limited visibility from the main viewpoints.

6.5 Discussion

The proposed development will not impact views to and from the vicinity heritage items. These heritage items, a road and stairs, are not affected by the development. Views towards Mosman Bay, the broader Sydney city skyline, and partial views of the Sydney Harbour Bridge will remain unaffected as identified on the holt conservation area view mapping. The proposed development enhances the view from Rangers Avenue towards Mosman Bay and Sydney through its stepped design of the primary façade, flat roof and communal spaces that open up the view corridor. The existing dwellings currently block views of Mosman Bay from the south-facing houses on Bloxsome Lane that are part of the HCA.

The existing dwellings are a mix of typologies and setbacks, while the proposed development offers a consistent design with setbacks that enhance views and provide opportunities for communal spaces and landscaping to enrich the streetscape.

The proposed development retains a large portion of the significant rock wall adjacent to 23-17 Rangers Avenue. To accommodate vehicular access via Rangers Avenue instead of Bloxsome Lane, the development has been adapted to utilise the existing cut/opening along the wall near 13 and 11 Rangers Avenue in accordance with Urbis heritage advice thereby mitigating any impact on the rock wall.

However, a small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest scale, predominate and representative part of the significant rock wall along 23-15 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.



Picture 31 The significant rock wall along Rangers Avenue, 21 Rangers Avenue being retained.



Picture 32 Rock wall along Rangers Avenue, stairs to 23 Rangers Avenue being retained.



Picture 33 13 Rangers Avenue where no rock wall is present.



Picture 34 11 Rangers Avenue Rock Wall highlighted with green arrow.

Additionally, a new boundary wall will be constructed to replace the existing mixed-material boundary wall. This new boundary wall will be compatible with the significant rock wall in both material and palette.

The character and scale of the Holt Estate is predominantly low-density (one – two storeys), Victorian and Federation style houses. Majority of the houses in the HCA have garages to the rear of the houses fronting the lane. The proposed development is part 6, part 7 storey residential development, which is noticeably contemporary in appearance and higher than the residential buildings in the HCA. Impacts of the proposed development on the HCA are mitigated through architectural design, which follows the existing topography of the area. The location of the site is behind the conservation areas which also has a lane creating a further setback and the development due to this is viewed in the background setting. The view lines and nearest road within of the HCA run east west while the site is located to the south so has limited visibility from the main viewpoints.

The cumulative impacts of the proposed development on the broader context are minimal. The broader Mosman area is primarily low-medium density residential dwellings, with two sections part of the LMR housing policy. The proposed development retains a medium density context, while accommodating an increase in available dwellings within the Mosman area. The proposed development is permissible under the LMR controls and the Affordable Housing SEPP that allows for a 30% uplift in height of the subject site.

6.6 Mitigation measures

To mitigate the impact of demolition the following is recommended:

- A Photographic Archival Recording of the existing dwellings should be undertaken prior to demolition. The purpose of the archival recording is to document the rock wall along the length of Ranger Road prior to the modification at 11 Rangers Road. As well as to document the existing setting, and the extant houses of the area. The Archival Recording must be prepared in accordance with the Heritage NSW Guidelines for 'Photographic Recording of Heritage Items Using Film or Digital Capture'.
- Retention and protection of the rock wall and sandstone retaining wall (23-17 Rangers Avenue), identified in the Mosman Residential DCP during all works.
- A schedule of conservation works should be prepared for the elements of rock wall that are stone blockwork.

7 Conclusion & Mitigations

A detailed impact assessment of the proposed works has been undertaken in Section 6 of this report.

The site is not located within a heritage conservation area or individually heritage listed on the LEP.

The proposed development has been assessed to have no detrimental impact on the vicinity heritage items 'Steps Bloxsome Lane' and has been carefully design with appropriate heritage advice relating to positioning of vehicular access to have no impact on the 'Rangers Avenue Divided Road' that is to the front of the site. This access is located to the eastern end where the natural rock and retaining wall steps down to road level, there are existing driveway crossings that are being utilised.

The below image shows where there is on grade access to the road which will be utilised at number 13 Rangers Ave. The green arrow indicates where natural rock and the sandstone retaining wall raised above existing ground/footpath/road level halfway along the front boundary of 15 Rangers Ave



Picture 35 The modern building at 13 Rangers Avenue and contemporary retaining wall.

Source: Urbis, 2025.

The proposed works will have no detrimental impact on the nearby Holts Estate HCA as the site is located to the rear of the large HCA. Key aspects of the proposal assessment are listed below.

This HIS supports the demolition of the subject dwellings at 11-23 Rangers Avenue. Some of the dwellings are modern or have been significantly altered. The remaining dwellings are considered generic examples of the architecture of the period, and have been assessed to not meet criteria for heritage listing.

However, a small section of the rock wall to the eastern end of the site at 11 Rangers Avenue is proposed for removal to allow pedestrian access into the new development. The section proposed for removal is at the lower end of the rock wall is low in height (around half a metre) compared to the significantly larger scale (2+ meters height of natural rock and combination stone blocks) of the remainder of the wall to the west. The design has been adapted as per the heritage advice provided by Urbis to ensure the most significant, largest scale, predominate and representative part of the significant rock wall along 23-15 Rangers Avenue is not impacted and is retained without change. This area of proposed alteration does have a heritage impact to the wall. However, this small section is minor in comparison to the more representative example and larger scale to the west and as outline below and at section and is considered a minor impact.

For the reasons stated above, the proposed works are recommended for approval from a heritage perspective having regard to the proposed recommendations below.

Mitigation measures

To mitigate the impact of demolition the following is recommended:

- A Photographic Archival Recording of the existing dwellings should be undertaken prior to demolition. The purpose of the archival recording is to document the rock wall along the length of Ranger Road prior to the modification at 11 Rangers Road. As well as to document the existing setting, and the extant houses of the area. The Archival Recording must be prepared in accordance with the Heritage NSW Guidelines for 'Photographic Recording of Heritage Items Using Film or Digital Capture'.
- Retention and protection of the rock wall and sandstone retaining wall (23-17 Rangers Avenue), identified in the Mosman Residential DCP during all works.
- A schedule of conservation works should be prepared for the elements of rock wall that are stone blockwork to conserve the wall into the future.

8 Bibliography & References

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[Note: Some government departments have changed their names over time and the above publications state the name at the time of publication.]

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