

**RE: OBJECTION TO STATE SIGNIFICANT DEVELOPMENT APPLICATION –
SSD-96272465 - PROPERTY: 11-23 Rangers Avenue, Mosman NSW 2088**

I am writing to formally object to the above State Significant Development (SSD) application lodged for 11-23 Rangers Avenue, Mosman. As a resident of Rangers Avenue, I have reviewed the Environmental Impact Statement (EIS) and accompanying appendices.

While I understand the need for housing supply, this specific proposal represents an overdevelopment that fundamentally conflicts with the statutory controls of the *Mosman Local Environmental Plan 2012* (MLEP 2012) and the established character of our street. It prioritises density over the safety and amenity of the existing community.

My specific grounds for objection are detailed below:

1. Unacceptable Pedestrian Safety Risks (Section 4.15(1)(b) EP&A Act)

The proposed development fails to adequately address the specific pedestrian safety constraints of Rangers Avenue.

- **Lack of Infrastructure:** Rangers Avenue lacks dual sidewalks. It is a heavily used pedestrian route for residents commuting to the ferry and, critically, for children attending the nearby Redlands School.
- **Conflict with Construction & Operational Traffic:** The Construction Traffic Management Plan (Appendix W) and Traffic Impact Assessment (Appendix BB) do not sufficiently mitigate the risk posed by heavy vehicle movements on a road where pedestrians are forced onto the carriage way due to missing footpaths. Increasing vehicle density in this specific location creates an unacceptable hazard for school children and commuters.

2. Traffic Congestion and "Rat Run" Issues

The Traffic Impact Assessment underestimates the current reality of Rangers Avenue.

- The street already functions as a "rat run" and experiences gridlock during school drop-off and pick-up times (Redlands school).
- The cumulative impact of additional service vehicles and resident traffic generated by this scale of development will exacerbate existing congestion, further compromising the safety and amenity of the street.

3. Excessive Scale and Bulk (Breach of Mosman LEP 2012)

The proposal is inconsistent with the development standards mandated by the *Mosman Local Environmental Plan 2012*.

- **Height Variation:** The applicant's own *Clause 4.6 Variation Request* (Appendix L) admits that the building exceeds the maximum building height and wall height standards.

- **Visual Impact:** The proposed bulk and scale are excessive and inconsistent with the streetscape. The visual impact of such a large structure in a street characterised by finer-grain housing is jarring and inappropriate. The justification provided for contravening the development standard is insufficient given the severity of the impact on the streetscape.

4. Incompatibility with Local Character and Heritage

- **Heritage Conservation Area:** Rangers Avenue is identified as a **Heritage Conservation Area (C11)** under Schedule 5 of the MLEP 2012. The proposed design does not respect the heritage significance of the precinct.
- **SEPP (Housing) 2021 Non-Compliance:** Section 20 of the *State Environmental Planning Policy (Housing) 2021* requires the consent authority to consider whether the design is compatible with the "character of the local area". A high-density, over-scaled building is fundamentally incompatible with the heritage character of the Rangers Avenue HCA.

5. Site Isolation and Unorderly Development

The amalgamation pattern proposed results in site isolation, leaving neighbouring properties (potential isolated sites) unable to be developed in an orderly or economic manner in the future. This represents "unorderly development," which is a valid ground for refusal under the planning principles established by the NSW Land and Environment Court (specifically the *Karavellas* principle).

6. Impact on Mosman Scenic Protection Area

The site is located within or adjacent to the **Scenic Protection Area** identified in the MLEP 2012 (Clause 6.4). The objective of this clause is to maintain the dominance of landscape over built form. The excessive bulk and scale of this proposal, combined with the removal of canopy trees identified in the Arboricultural Impact Assessment (Appendix H), contravenes the objective of maintaining the scenic quality of the Mosman hillside and Sydney Harbour foreshore.

7. Lack of Genuine Community Engagement

The *Engagement Outcomes Report* (Appendix P) claims consultation has occurred, yet as a resident, I feel the process has been a "tick-box" exercise rather than genuine engagement. The community's deep concerns regarding safety and character, raised early in the process, have not been meaningfully incorporated into the design.

8. Prematurity and Conflict with Strategic Planning

Mosman Council has an in-principle agreement with the NSW Government to develop a Master Plan that will strategically identify appropriate locations for housing growth.

- Approval of this application **prior to the completion of the Master Plan** undermines the strategic planning process.

- It represents *ad hoc* planning that compromises the holistic vision for the suburb. The application should be rejected or paused until the Master Plan is finalised to ensure this site is actually deemed appropriate for such density.

Conclusion

This development proposes a scale and density that is unsafe for the specific street conditions of Rangers Avenue and destructive to its heritage character. It asks the consent authority to set aside the community's safety and the Council's planning controls for the benefit of a single site.

I urge the Department and the Minister to **refuse** this application.

Yours sincerely,

Luke Mahe