
1. The properties at 11–23 Rangers Avenue Lack Built-Form Transition Between R3 and C4 Zones

C4 Environmental Living zones—such as those north of the site—were intentionally excluded from LMR policy due to their **scenic, ecological, and landscape values**. These zones require **sensitive transition** from adjoining R3 development.

However:

- The proposal **maximises (and exceeds)** the LMR height and scale envelope, offering **no meaningful transition** to the C4 zone or to the Scenic Protection Area to the south and east.
- The EIS claims, without justification, that height transition has been “carefully modelled.” There is no evidence of this.
- The absence of a transition undermines the very policy rationale for excluding C4 land from the LMR program.

This issue also interacts with failures in the applicant’s visual impact, view sharing, and heritage assessments.

Refer to: Environmental Impact Statement

2. Inadequate and Misleading Visual Impact Assessment

The applicant’s Visual Impact Assessment incorrectly states that only “part of the site” is within Mosman’s Scenic Protection Area (SPA). **In fact, the entire site is within the SPA**, as is the Holt Estate Heritage Conservation Area immediately north of the site.

Major issues:

- Section 3.2 incorrectly claims the site is not near a heritage conservation area and omits the heritage-listed Holt Avenue street trees (Heritage Item I380).
- The assessment includes **no visual analysis from the north** (Holt Avenue, Spencer Road, or the HCA). This omission makes proper assessment impossible and likely masks significant visual impacts.
- The assessment wrongly assumes surrounding low-density areas will eventually redevelop under LMR controls—this is false. The C4 zone and large areas to the south and east are **not** eligible for LMR redevelopment.
- Photomontages understate impacts when viewed from Mosman’s Scenic Protection lands to the south.

Recommendation:

Request that the Department require a **revised Visual Impact Assessment** including analysis from the north and correcting misstatements regarding scale, zoning, and SPA conditions.

Refer to: Appendix CC – Visual Impact Assessment | MLEP 2012 Clause 6.4 | Scenic Protection maps

3. Deficient View Loss and View Sharing Assessment

The Department required the applicant to provide a detailed assessment consistent with **Tenacity** (LEC) principles and **Clause 6.4 Scenic Protection** of the MLEP 2012. The applicant has not done so.

Under Clause 6.4, consent cannot be granted unless visual impacts to and from Sydney Harbour are minimised and the natural landscape and landform are retained.

Issues:

- No evidence is provided of measures to minimise impact on harbour or CBD views.
- The ridgeline character—where Holt Avenue properties sit above Rangers Avenue before the land descends—will be fundamentally altered by the proposed building’s bulk and height.
- The development will significantly affect both private and public views from community and foreshore areas.

Recommendation:

Request that the Department require the missing detailed view loss assessment and provide your own photographic evidence of impacts (especially from community spaces, which carry greater weight).

Refer to: Appendix CC – Visual Impact Assessment | MLEP Clause 6.4

4. Heritage Impacts Are Understated

The Heritage Impact Statement (HIS):

- Downplays the significance of the Holt Estate HCA, selectively quoting the Mosman Residential DCP while ignoring statements that identify the precinct as a key heritage element of the LGA.
- Ignores that most homes on Holt Avenue and Spencer Road are classified as “**contributory**” in the Mosman heritage map.
- Claims impacts are mitigated through design “following existing topography”—a statement inconsistent with the proposal’s scale and bulk.
- Fails to list or discuss Heritage Item I380 (Holt Avenue street trees), classified as “rare” and recognised as one of Mosman’s finest avenues.

Recommendation:

Objectors should highlight the exceptional heritage value of the Holt Estate HCA and its streetscapes, and the incompatibility of the proposed development with local planning controls intended to preserve this character.

5. Misalignment with the Intent of the SSD Pathway

While the proposal technically qualifies as a State Significant Development due to cost and affordable housing component, the actual intent is the delivery of a **luxury, harbour-view apartment complex**:

- Affordable housing is used primarily to facilitate SSD eligibility.
- Proposed design segregates affordable housing tenants through separate entry, lifts, and reduced access to communal facilities—undermining the social intent of SSD housing pathways.
- The developer’s track record demonstrates a focus on luxury, high-end developments, inconsistent with the SSD program’s public-interest objectives.

Granting SSD approval under these circumstances would undermine the credibility of the State Significant Development framework.

6. Inadequate Community Engagement

SEARs require applicants to demonstrate compliance with the **Engagement Guidelines for State Significant Projects** and show how feedback shaped the design.

Issues:

- Only a small number of properties were contacted before proposal lodgement.
- Some homes identified as “consulted” did not receive any communication.
- Many properties directly affected were not contacted at all—contrary to the SEARs requirement for early and meaningful consultation.

Objectors should clearly state if they were not consulted and explain the impacts they expect on their property.

Refer to: Appendix P – Engagement Outcomes Report

Additional Issues to Consider

Environmental Factors Associated With High-Density Living, such as;

1. Physical Environment

Air Quality

- Higher emissions from traffic
- Reduced ventilation due to closely packed buildings
- Increased exposure to particulate matter and smog

Noise Pollution

- Traffic, public transport, construction, and dense human activity can affect sleep, stress levels, and cognitive performance

Limited Green Space

- Higher heat retention due to concrete (urban heat island effect)

Urban Heat Island Effect

- Dense buildings absorb and retain heat
- Higher temperatures, especially in summer
- Increased energy use for cooling

Waste Management Challenges

- Greater waste generation
 - Pressure on sewage and sanitation infrastructure
 - Risk of pest infestations
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2. Social Environment

Crowding Stress

- Psychological stress from limited personal space
- Increased noise and reduced privacy
- Higher interpersonal conflict potential

Social Interaction Patterns

- Can enhance social opportunities — but may also lead to social isolation if design is poor

Public Safety Concerns

- Higher population concentration may increase crime risk
 - Requires stronger surveillance and community policing
-

3. Infrastructure & Services

Transportation Strain

- Traffic congestion
- Overloaded public transit

Pressure on Public Services

- Healthcare, schools, and emergency services may be stretched
- Higher demand for utilities (water, electricity)

Housing Quality

- Smaller living spaces
 - Poor ventilation and limited access to natural light in some buildings
-

4. Health and Well-Being

Disease Transmission

- Close proximity increases spread of infectious diseases
- Higher reliance on shared facilities (elevators, public transit)

Lifestyle Changes

- More sedentary behaviour
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5. Environmental Sustainability Factors

Energy Efficiency

- High-density housing can reduce per-capita energy usage — but old or poorly designed buildings may be inefficient

Water and Resource Use

- Demand on water systems increases
 - Requires efficient design to avoid shortages
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Summary

High-density living can offer benefits (efficient land use, economic opportunities, better public transport) but comes with **environmental challenges** such as pollution, noise, heat stress, limited green space, infrastructure pressure, and increased disease risk.