

Objection Notes

Date	15 December 2025
Project	11-23 Rangers Avenue Mosman
Project No.	2520
Resident Address	16 Holt Avenue Mosman
Resident Applying for Objection	Sonni Jeong



Image Source: Nearmap

Objection Notes

Dear Assessment Officer,

I am a resident of 16 Holt Avenue, Mosman and have reviewed the development application. I object to the proposal because, although it refers to the LMR objectives, it fails to adequately address several key impacts, including:

1. Inconsistency with the Zone Objectives
2. Response to the Surrounding Community and Existing Character
3. Building Height
4. Inconsistency with Affordable Housing Objectives
5. Lack of Buffer Zone between R3 and C4 Zones

Objection Notes

1. Inconsistency with the zone objectives

The R3 zoning of the site and the surrounding C4 land place clear importance on their zone objectives under the Mosman Local Environmental Plan 2012, as set out below, yet the proposal disregards these objectives by introducing excessive bulk and a built form that is not desirable for the local amenity. The additional provisions of the Mosman LEP 2012 also require assessment of visual impacts to and from Sydney Harbour, however Appendix CC Visual Impact Assessment only considers views from the harbour and fails to assess the equally significant impacts on views to the harbour from existing residential properties.

R3 zone

- *To provide for housing that is compatible with the desired future character of the area in terms of bulk, height and scale.*
- *To encourage residential development that has regard to local amenity and, in particular, public and private views.*

C4 zone

- *To maintain the general dominance of landscape over built form, particularly on harbour foreshores.*
- *To ensure that sites are of sufficient size to provide for buildings, vehicular and pedestrian access and landscaping and to retain natural topographical features.*
- *To ensure that development is of a height and scale that achieves the desired future character of the area.*
- *To encourage residential development that maintains or enhances local amenity and, in particular, public and private views.*
- *To minimise the adverse effects of bulk and scale of buildings.*

6.4 Scenic protection

(1) *The objectives of this clause are as follows—*

- (a) *to recognise and protect the natural and visual environment of Mosman and Sydney Harbour,*
- (b) *to reinforce the dominance of landscape over built form,*
- (c) *to ensure development on land to which this clause applies is located and designed to minimise its visual impact on those environments.*

(2) *This clause applies to land identified as “Scenic Protection Area” on the [Scenic Protection Map](#).*

(3) *Development consent must not be granted to any development on land to which this clause applies unless the consent authority is satisfied that—*

- (a) *measures will be taken, including in relation to the location and design of the proposed development, to minimise the visual impact of the development to and from Sydney Harbour, and*
- (b) *the development will maintain the existing natural landscape and landform.*

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2. Response to the surrounding community and existing character

Mosman Local Environmental Plan 2012 and Mosman Residential Development Control Plans clearly states the development is to be consistent with the desired future character of the area and

“To have a scale of development which is not excessive and is consistent with the existing or desired future townscape area character.”
Mosman Residential DCP. The proposed development clearly departs from the relevant objectives and results in a design that is not sympathetic to Mosman’s established character. It makes no meaningful attempt to respond to or complement the architectural language of nearby developments, for example 171–179 Avenue Road, Mosman, where the façade treatment respects adjoining properties by retaining a comparable heritage frontage and archways.

The responses in Appendix P – Engagement Outcomes Report do not demonstrate genuine community consultation, instead, they read as argumentative justifications of the existing design, with no meaningful attempt to modify the proposal to respond to surrounding residents, which undermines the purpose of the consultation process.

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3. Building Height

Objection Reason:

As shown in the Woods Bagot DA architectural drawings, the proposed building exceeds the height plane at the eastern corners, noting that this height plane is already set at 30 per cent above the maximum permissible building height. This excessive height is inappropriate in the local context and results in a dominant blank wall presenting to the adjoining property at 9 Rangers Avenue, Mosman, which is only two storeys in height when measured from Bloxome Lane.



HEIGHT PLANE DIAGRAM - SOUTH-EASTERN CORNER

Image Source: Appendix B_DA Drawing Set.pdf - sheet no.DA5030

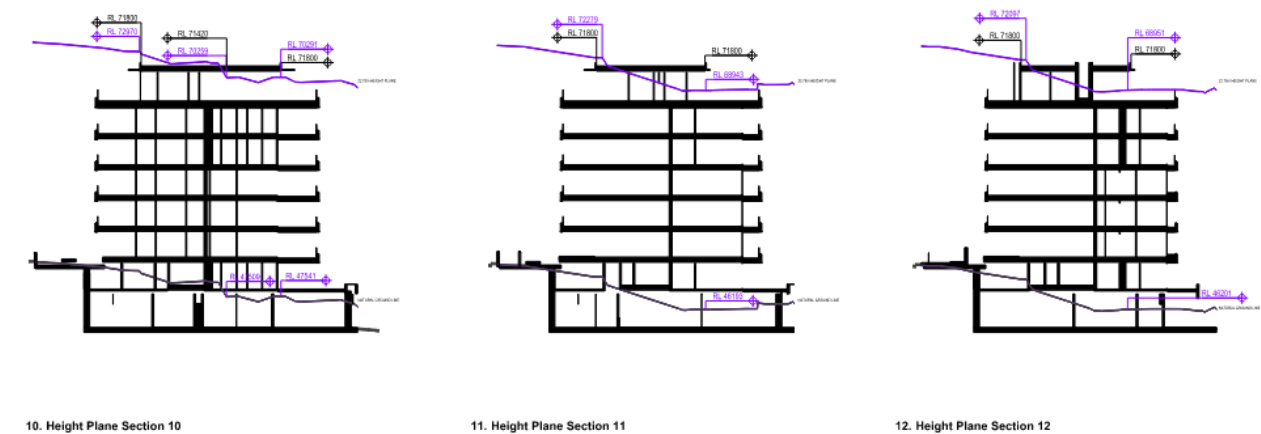


Image Source: Appendix B_DA Drawing Set.pdf - sheet no. DA5033

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I also note that from the Appendix P - Engagement Outcomes Report.pdf, the report notes on Project Response section on page 42, regarding the Height and Scale, that

“The proposal utilises the Low and Mid-Rise (LMR) housing provisions and the Infill Affordable Housing provisions to inform the density and built form. The building’s height across the majority of the site, sits within the permissible height plane of 22.75m, with only a minor exceedance at the south-eastern corner. Further details can be found in the EIS and accompanying technical reports. The proposal is considered to create low to medium visual impacts. High visibility is limited to a number of close proximity properties along Holt Avenue. Whilst the proposal differs in relation to the existing scale and form, it remains compatible with the desired future character anticipated by the LMR policy.”

This statement is incorrect, as the proposal clearly exceeds the original 17.5 metre height plane by more than a minor amount (even before applying the 30 per cent bonus), and the resulting visual impact is not low to medium. I have attached a photograph below taken from my living room with the proposed building mass overlaid in dark grey to illustrate the extent of the impact.



Image Source: Image Shot from 16 Holt Avenue Mosman Living

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4. Inconsistency with Affordable Housing Objectives

The development places all affordable housing units at the north eastern end of the building with a separate lobby, effectively creating so-called “poor doors” that segregate residents by income. “Poor doors” are widely criticised in planning and housing policy because they physically separate lower income households through different entrances, circulation and amenity, and are seen as a visible symbol of social and economic inequality rather than genuine mixed housing.

Recent examples in Sydney, such as the Barangaroo affordable housing entrances, have attracted strong public and political concern for exactly this kind of separation, where key workers must enter via a rear, downgraded access and are excluded from facilities used by private residents. This approach undermines the stated purpose of affordable housing, which is to support inclusion and social cohesion, and instead reinforces stigma, hierarchy and disadvantage within a single development. Contemporary affordable housing guidance increasingly expects “tenure blind” design, where affordable and market dwellings share comparable entrances, are well integrated in the street and are not easily distinguishable in the public realm.

Internationally, a number of jurisdictions have moved to discourage or ban “poor doors” in projects that receive planning bonuses or tax incentives, recognising that income-segregated entrances are inconsistent with the objectives of mixed tenure housing and equality of dignity for residents. Research and commentary also make it clear that separate entrances are not a technical or regulatory necessity, but rather a choice driven by financial, management and design priorities. In this proposal, clustering all affordable units in one corner and giving them a separate lobby appears to exploit planning incentives for additional gross floor area and building height without delivering genuinely integrated housing outcomes. For these reasons, the configuration should be thoroughly reviewed, and any bonus floor space and height associated with the affordable housing component should be significantly reduced unless the design is revised to provide properly integrated, tenure-blind access and amenity for all residents.

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5. Lack of Buffer Zone between R3 and C4 Zones

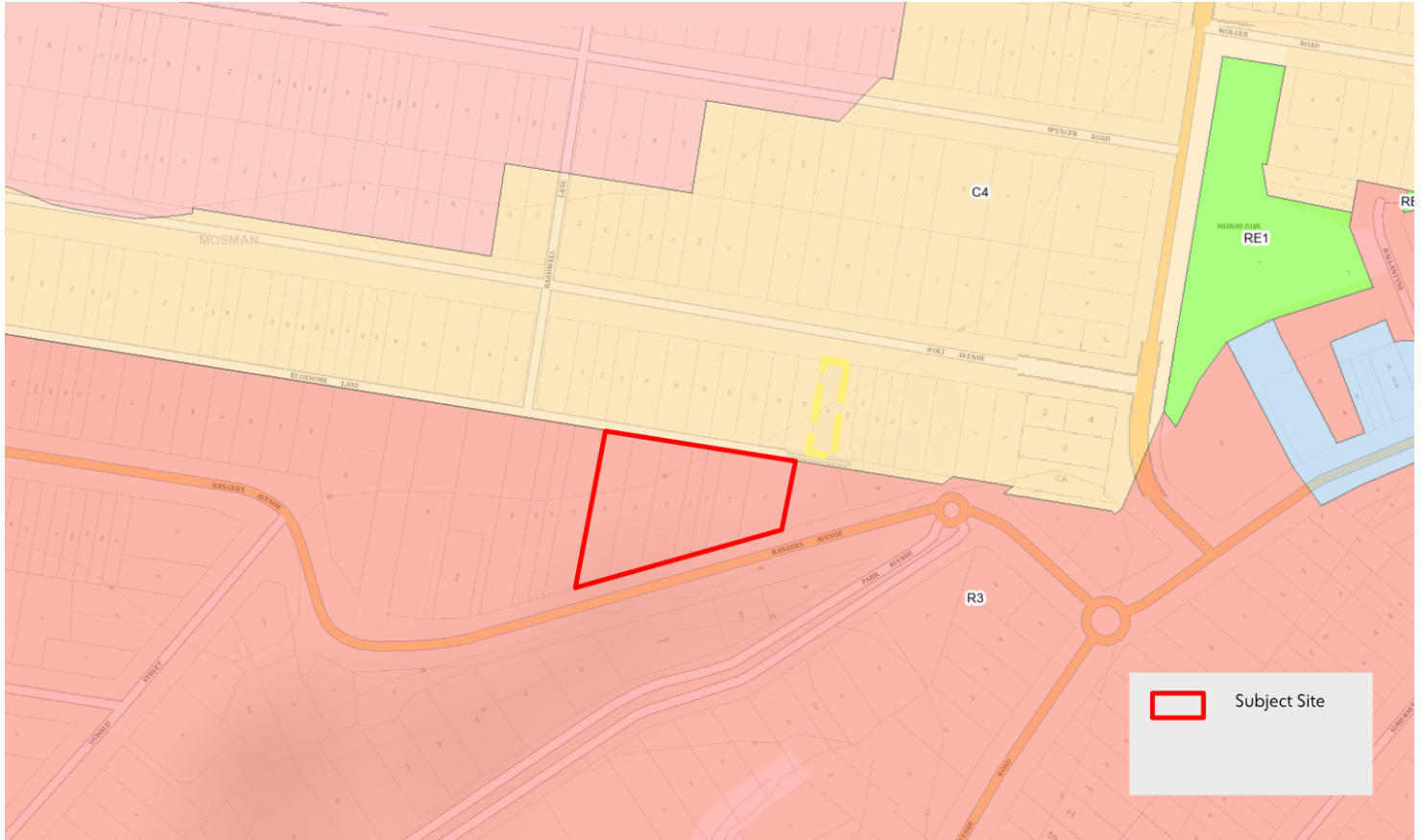


Image Source: Planning Portal

The absence of a clear height “buffer” or transitional control between R3 Medium Density Residential and C4 Environmental Living zoning in Mosman can undermine the intent of nearby heritage conservation areas, with a focus on the Holt Avenue streetscape within the Holt Estate Heritage Conservation Area. It draws on the Mosman LEP 2012 written instrument, LEP maps, and the Holt Estate heritage survey.

The Mosman LEP 2012 explicitly aims to:

- provide housing while maintaining existing residential amenity
- recognise, protect and enhance Mosman’s natural, visual, environmental and heritage qualities, including scenic areas and significant harbour views
- protect and conserve natural, built and Aboriginal cultural heritage
- protect landform and vegetation to maintain Mosman’s landscape amenity

These aims establish that development intensity and built form must be managed so Mosman’s scenic and heritage character is not eroded by abrupt changes in scale at zone edges.

R3 Medium Density Residential seeks to accommodate a wider variety of housing types in a medium-density setting, while still requiring

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compatibility with desired future character, including bulk, height and scale.

C4 Environmental Living seeks low-impact residential outcomes in environmentally sensitive settings and places strong emphasis on protecting scenic, ecological and landscape values, including ensuring development achieves desired future character in bulk, height and scale, and maintaining the dominance of landscape over built form.

In simple terms, R3 can drive change and intensification and C4 is intended to be visually and environmentally restrained. Without a transition mechanism, the R3 developments can visually dominate the C4 side, even if development in C4 is itself limited.

Under the LEP, building height is primarily managed by:

- Clause 4.3 (Height of buildings), which sets maximum building heights by reference to the Height of Buildings Map
- Clause 4.3A, which adds specific provisions for land where an 8.5 m maximum height applies (including a test around whether a proposal is more than 2 storeys and whether it is compatible with surrounding development, among other matters).

The issue is that this framework is still largely a single-number cap per site, and it does not inherently create a graduated interface at a zone boundary. Where the mapped heights are the same (or close) on both sides of an R3/C4 edge, there is no mapped step-down or “transition strip”, so the boundary can function as a hard line rather than a designed change in scale.

Heritage conservation areas rely on continuity of form and a consistent suburban scale, not just individual heritage items. The Holt Estate survey highlights that the area’s heritage value is closely tied to the intactness of subdivision and streetscape character.

The same survey notes that intrusive replacement development can diminish significance, and it explicitly flags cases where scale and “assertiveness” are problematic, recommending future development that is less visually dominant and more sympathetic to the established streetscape.

A weak or missing height transition near an HCA is therefore not just a numeric planning issue, it enables built form outcomes that can break the heritage “reading” of the street, particularly where a medium-density envelope presents as bulky, tall, or visually overbearing relative to the established suburban pattern the conservation area is meant to conserve.

Where R3 intensity meets environmentally or heritage-sensitive land without an intermediate control, common impacts include:

- Streetscape discontinuity - taller or bulkier forms interrupt the heritage rhythm of lots, setbacks, and roofscapes
- Landscape and canopy loss pressure - higher yield expectations often increase excavation, retaining walls, driveway width, and tree removal, undermining landscape dominance outcomes sought in scenic areas
- Visual dominance at edges - development appears as a “wall” at the interface, undermining the C4 intent of restrained built form and the LEP’s scenic-protection aims
- Privacy and amenity impacts - elevated floor levels and terraces increase overlooking into lower-scale suburban fabric, conflicting with maintaining residential amenity

A functional interface control between R3 and C4 (particularly where heritage character is nearby) should:

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- step development down so bulk reduces toward sensitive edges
- prioritise landscape structure (deep soil, canopy trees, planted setbacks) at the boundary
- protect heritage streetscape legibility, including consistent scale and roofscape character
- avoid “cliff edge” outcomes where the boundary reads as an abrupt planning failure
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This aligns with the LEP’s scenic, heritage, and landscape aims and with the C4 objective of landscape dominance over built form.

I would hope Council, and any relevant government review body, assess proposals at the R3 to C4 interface with these points in mind, requiring a clear transition envelope (reduced upper-level floor plates, increased setbacks and articulated roof forms) and applying heightened scrutiny to visual bulk, overlooking, deep soil retention and canopy replacement to protect scenic and heritage character.

The Mosman LEP 2012 clearly prioritises scenic protection, heritage conservation, landscape amenity and residential amenity, but the current LMR height control structure can fail to deliver these outcomes at sensitive interfaces because it does not inherently create a graduated height transition at R3/C4 edges. This gap can directly undermine the Holt Avenue (Holt Estate) Heritage Conservation Area by enabling abrupt changes in bulk and scale that erode the suburban streetscape character the HCA is intended to conserve.