

Formal Objection to Proposed Residential Development at 11-23 Rangers Avenue, Mosman Submission regarding SSD-9627246

As long-standing residents of Holt Avenue, Mosman, we are writing to express our objection to the Development Application SSD-9627246 11-23 Rangers Avenue, Mosman. As our house backs directly onto the proposed development, we are deeply concerned about the detrimental impact this enormous structure will have on our neighbourhood and the broader community.

We are not opposed to development, however, what is being proposed by the Applicant is clearly a case of developer opportunism rather than considered, integrated and strategic urban planning. A considered approach is required to assess where to best locate the necessary additional housing volume rather than opportunistically buying up houses with views to build luxury apartments and add affordable housing to increase the size of the development. It is evident from the applicant's submission their overall objective is to capitalise and maximise profitability with total disregard to the neighbouring properties and its impact on residents in Holt Avenue and neighbouring precinct properties. The development effectively erodes heritage qualities of the Holt Avenue heritage conservation area.

We wish to draw your attention to the following issues of concern regarding this proposed development:

800 Metre Rule

- 11-23 Rangers Avenue properties are not located within 800 m walking distance of the Cremorne Town Centre and therefore do not qualify for LMR Outer Area controls. The Housing SEPP states "route that may be safely walked by a pedestrian using as far as reasonably practical, public footpaths and pedestrian crossings" (please see the surveyor report from Survplan jointly commissioned by a group of the homes directly impacted on Holt Ave)
- The applicant's Surveyors report is based on crossing Spofforth Street at Spofforth and Holt Avenue which has many serious safety issues. This is not a safe crossing and is against SEPP definitions. The Applicant's Traffic Impact Assessment fails to assess traffic in this area. (please see accident report) We also wish to highlight the choice of the post office at the extreme edge of the town centre and not the centre of the town centre being the measurement point for the 800 m rule.
- Remarkably, the only safe pedestrian access routes to the Cremorne Town Centre from Rangers Avenue require using designated pedestrian crossings at – Spofforth Street and Military Road (Traffic lights) alternatively Spofforth Street and Rangers Road

Based on the absence of any evidence demonstrating a safe, compliant, SEPP-defined walking route within 800 m, we request that the Department reject the development application on the grounds that the subject properties are not eligible for LMR Outer Area provisions.

Built Form Transition

- The Holt Estate Conservation Area is zoned C4 Environmental Living. C4 zones were excluded from the LMR policy under the Housing SEPP due to their intrinsic

environmental, landscape, and scenic values. As a result of this, an appropriate built form transition in adjoining R3 Medium Density Residential zones is essential. We believe that development within R3 land that directly adjoins a C4 zone must be carefully designed to respect the scale, character, and landscape qualities of the neighbouring environmental living area.

- There is no built form transition. The proposed development seeks to maximise—and in places exceed—the building height and scale permitted under the LMR policy, resulting in a built form that fails to acknowledge or respond to the immediately adjoining C4 zone to the north, which includes parts of Holt Avenue and Spencer Road. This is fundamentally inconsistent with the policy intent behind the C4 exclusion, which requires protection from abrupt, visually intrusive development at the environmental interface.

Visual Impact Assessment

- Section 3.2 of the VIA incorrectly states: *“We note that no part of the site falls within or near a heritage conservation area.”* This is totally incorrect and lacks any research of credible factual intelligence available from Mosman Council or other resources. The site is directly adjacent to the Holt Estate HCA, and the VIA also excludes the heritage-listed trees along Holt Avenue. The applicant also failed to provide any visual analysis from the north—including from Holt Avenue, Spencer Road, and other areas within the Holt Estate HCA. Therefore, it is not possible for an adequate assessment of visual impact or view loss to be undertaken. This omission may be intentional, as views from the north are likely to show moderate to high visual impacts.

Request for Further Information:

Given the many errors and omissions in the VIA, we request that the Department require the applicant to:

- Provide a revised Visual Impact Assessment that includes comprehensive visual analysis from the north of the proposed development, including views from Holt Avenue and other representative locations within the Holt Estate HCA.
- Correct the inaccurate claim that the scale of the proposed development will be moderated by future LMR development, noting that the surrounding C4-zoned land is permanently excluded from LMR up-zoning and exists to preserve scenic and environmental values.

View Loss and View Sharing Assessment

We currently enjoy expansive district and skyline views extending from Bondi Junction through to the Sydney CBD. These views are an important part of our daily amenity and serenity and would be obstructed by the proposed development.

Our home also benefits from valued views of Sydney Harbour, including clear sightlines to the New Year’s Eve and other harbour fireworks, which we regularly watch from our balcony. We work from home and routinely have our morning coffee on the balcony, taking in these outlooks. The loss of these views and privacy—and also extremely important - the reduction of open sky—would result in a significant and permanent diminution of our residential amenity.

- The applicant has not demonstrated any meaningful measures to minimise impacts on views to Sydney Harbour, the CBD, or other key scenic vistas. In their submission their information was obtained through desktop analysis - no engagement with residents.
- Clause 6.4(30) of the Mosman LEP 2012 requires that development consent must not be granted unless the consent authority is satisfied that:

(a) *“measures have been 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.”*

- These provisions make clear that view protection is a statutory requirement, not simply a courtesy to neighbouring properties. Preservation of views, landscape character, and the natural landform is a matter of compliance with planning law and the broader public interest.

Impact on Heritage Areas

The Holt Estate HCA and surrounding streets are among Mosman’s, and arguably Sydney’s, most aesthetic and iconic streetscapes. The Heritage Impact Statement (HIS) downplays the significance of the Holt Estate Heritage Conservation Area (HCA).

- The proposed development, which will form a permanent backdrop to this heritage area, will diminish its heritage character and is wholly inconsistent with local planning controls designed to preserve the area’s historic and aesthetic values.
- The Mosman Heritage Ranking Map identifies the vast majority of homes on Holt Avenue and Spencer Road as “contributory” to the heritage character, not “neutral” or “detracting.” This confirms that the area retains high heritage significance that cannot be ignored.
- The scale, bulk, and siting of the proposed building are such that it will dominate the streetscape, rather than harmonising with the ridgeline or surrounding heritage context.

Misalignment with State Significant Development (SSD) Policy Intent

- While the development technically qualifies as a State Significant Development due to its high estimated cost and inclusion of an affordable housing component, it is obvious that the project is not genuinely intended to provide affordable housing. Instead, the affordable housing element appears to have been included primarily to facilitate a luxury harbour/CBD view apartment complex, aimed at maximising developer profits and selling values, and which will remain inaccessible to the vast majority of the population.
- Tenants eligible for the affordable housing component would experience restricted access, with a separate residential lobby (within the eastern residential lobby), separate lift access, and reduced access to common facilities and amenities compared with other residents. Additionally, the provision of five car parking spaces for ten apartments highlights the inequitable treatment of affordable housing tenants, creating social segregation within the development.
- Approval of this project under the SSD pathway would undermine the intent of the NSW Government’s State Significant Development policy, effectively setting a precedent that could allow luxury developments to bypass local planning controls under the guise of affordable housing.

(Refer: Letter from the Member for Warringah to the NSW Planning Minister regarding the use of the SSD pathway for this project.)

Traffic Impacts

- The proposed development will significantly increase traffic on Rangers Avenue and will funnel additional traffic onto Holt Avenue and other neighbouring access roads during both the construction phase and after project completion.
- This increase in traffic may lead to safety risks for pedestrians and cyclists and reduce accessibility for existing residents.
- The Proposal also includes demolition and extreme amounts of excavation material to be trucked off the site over an anticipated period of four months with access via Rangers Avenue that currently has a three-ton limit for trucks (which is visibly signposted) adding congestion to existing traffic flow.

Off-Street Parking Pressure

- The development is likely to place additional strain on off-street parking, exacerbating existing parking pressures in the area and affecting residents' day-to-day convenience.

Construction Impacts on Surrounding Homes

- Extensive excavation to 10-20m will be required to construct the proposed underground car park, raising the potential for damage to the structural integrity of neighbouring properties.
- Residents are justifiably concerned about potential settlement, vibration, or other construction-related impacts.

Wind Tunnel and Southerly Breeze Impacts

- The height and bulk of the proposed building may have the potential to create wind tunnel effects at both the eastern and western ends of the development.
- Residents of Holt Avenue, immediately north of the proposed site, may experience a loss of the natural southerly breeze, reducing ventilation and the amenity of private outdoor areas.
- These impacts on local wind patterns could diminish the liveability of neighbouring properties and should be fully assessed and mitigated before approval.
- We would also like to point out that a crane for this size of development would be a significant size and it would tower over Rangers Ave and the houses in Holt Ave – where there is no protection from the strong winds

Conclusion:

For all the reasons outlined above, we respectfully but firmly urge the responsible planning authority to refuse this application in its entirety. The project involves extensive excavation, tree removal, landscaping and infrastructure works, fundamentally reshaping what is currently a quiet, low-rise streetscape and replacing it with one of the largest and most visually dominant buildings ever proposed for this part of Mosman.

We request that this objection be given full consideration in the assessment process. The precedent set by this decision will reverberate throughout our community for decades to come. We trust that the planning authority will demonstrate its commitment to heritage protection, appropriate development assessment, and community amenity by refusing this inappropriate proposal. We welcome additional affordable housing in the Mosman area as part of the Alternative Plan being prepared by Mosman Council.

Three additional separate reports addressing Traffic, Heritage and Town Planning are being submitted. These reports have been jointly commissioned by a group of directly impacted residents on Holt Avenue.



View from Balcony overlooking
21 and 23 Rangers Avenue



Sky space from living area looking towards
21-23 Rangers Ave – most of this sky space
Will disappear if development goes ahead



View from balcony towards city

