

## Objection to SSD-96272465 - Mosman

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**Sent:** Friday 17 October at 4:32 pm

Objection to proposed development at 11–23  
Rangers Avenue, Mosman 2088 (6-storey / 44-  
unit SSD proposal)

To the Consent Authority,

We object to the above-mentioned  
development on the grounds of inadequate  
pedestrian safety in Bloxsome Lane, the  
primary walking route to the site which has no  
footpath.

Grounds of objection:

1. The LMR walking-distance rule requires  
measurement along the lawful, safe and  
continuous walking network. A route that is  
hazardous or not reasonably accessible must  
not be relied on to justify the development's  
increased scale and density.

2. Bloxsome Lane is a narrow carriageway with  
a vehicular dead-end (without turning circle)  
adjacent to the development site. It is a single  
vehicle-width lane used by two-way traffic  
from Holt Avenue and Rangers Avenue. There

is no footpath and no space for installing a footpath.

Two-way vehicle movement on a narrow lane increases the risk of pedestrian/vehicle conflict, hence this is not an appropriate primary pedestrian corridor for a major multi-unit development. This risk is magnified when the lane is expected to carry additional pedestrian flows generated by 44 new dwellings.

3. The lane has constrained geometry for a single line of traffic and few, mostly-inadequate, overtaking zones, and terminates close to steep, heritage-listed, stone steps at one end (the dead-end mentioned above). The physical constraints within the lane (no footpath, narrow total width, pinch points and gradients) reduce usability by prams, older people and people using mobility aids. The proposed development will place people with reduced mobility into an environment that is not compliant with current access standards. Compliance with AS 1428.1 (design for access and mobility) must be demonstrated for any pedestrian route relied upon for access.

4. The applicant must show that public lighting along Bloxsome Lane meets recognised standards for pedestrian safety. Public lighting design should meet AS/NZS 1158 (lighting for roads and public spaces) including Category P requirements for pedestrian areas. Inadequate illumination increases the risk of trips, falls and personal security incidents at night, especially in a lane without any footpath. However increased lighting could disturb residents trying to sleep and is not a preferred option.

## Requested assessments and evidence:

We request the consent authority to require, as a minimum, the following prior to making any approval decision:

- A Pedestrian Safety Audit prepared to Austroads/State guidance that specifically assesses Bloxsome Lane with current and predicted pedestrian flows from the development.
- A Traffic Impact Assessment and swept-path analysis showing how two-way vehicle movement will operate safely with increased pedestrian use, and whether single-lane operation, vehicle restrictions or physical changes are required.
- A lighting audit with measured lux levels and a design to AS/NZS 1158 (Category P) showing how lighting will be upgraded to meet pedestrian safety and amenity standards without disturbing residents.
- An accessibility compliance statement demonstrating continuity of an accessible pedestrian route complying with AS 1428.1 from the development to the town centre and to key local services.
- Evidence of the legal status of the lane and any pedestrian easements.

## Requested outcomes:

If the above cannot be demonstrated to the authority's satisfaction, the application must be refused on the grounds that the proposal relies on an unsafe and inadequately lit

pedestrian corridor to justify development intensity under the LMR policy.

Alternatively, if approval is contemplated, impose conditions that require physical upgrades and legal guarantees before any occupation certificate is issued. Upgrades should include formalised pedestrian priority without restricting or diminishing access for current users, removal or control of two-way vehicle conflict, and lighting upgrades to AS/NZS 1158 Category P which do not disturb residents.

Conclusion:

The projected increase in pedestrian movements from a 44-unit development will materially change the safety profile of Bloxsome Lane. The consent authority must not accept the lane as the primary access route without robust, certified evidence that it is lawful, continuous, accessible and lit to recognised standards.

Yours faithfully,

Mark Hutchings & family,  
Owner residents of Holt Avenue, Mosman  
2088

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