

3 Holt Avenue,
Mosman NSW 2088.

Amy Watson,
Director,
Affordable Housing Assessments,
NSW Department of Planning, Housing and Infrastructure

Attn: Ritu Shankar

Dear Amy,

Re: Residential development with infill affordable housing at 11 – 23 Rangers Avenue, Mosman (SSD-96272465)

We wish to lodge a submission objecting to this proposal.

We have lived in Holt Avenue since 1983 and at our present address since 1992. We walk regularly in the neighbourhood, including to and from the Cremorne Town Centre. As long-term residents, we know the district very well.

Our main concerns with the proposal are discussed below.

1. Is the subject site within 800 metres of the Cremorne Town Centre?

The report of LTS (11 November 2025)¹ states that two walking routes from the site to Cremorne Town Centre (CTC) meet “...the definition of walking distances as it (sic) follows existing, safe, publicly accessible pedestrian pathways recognised by Mosman Council” and confirm that “...the subject site is within 800 metres walking distance of the Cremorne Town Centre, as per the Low and Mid-Rise Housing (LMR) Policy – Stage 2.”

Spofforth Street forms the western boundary of Mosman LGA where it adjoins North Sydney LGA. Insofar as the proposal may have satisfied any requirements of Mosman Council, these do not apply to routes on the western side of Spofforth Street and it is incorrect to state that they do.

We dispute LTS’ choice of walking routes as meeting the test for “the shortest distance between two points measured along a route that may be safely walked by a pedestrian using, as far as reasonably practicable, public footpaths and pedestrian crossings.”

We note in respect of the proposal’s two preferred walking routes that LTS has measured distance to the Cremorne Town Centre (CTC) from the western boundary of 23 Rangers Avenue, known as Lot 37/Section A/DP2509. To infer that this measurement is representative of a site for which the component (seven) lots have yet to be amalgamated, is not only misleading but gives the

¹ Referenced also at 3.5 of the Traffic Impact Assessment prepared by JMT Consulting, 19 November 2025.

appearance of having been chosen to optimise proximity of the site to the CTC within the 800-metre requirement.

We believe that the LTS study has overstated the safety aspects of the routes after they cross Spofforth Street, as follows:

- Contrary to LTS' claim that "all paths (in the applicant's preferred options) used are ... clearly signposted pedestrian connections," the only pedestrian crossing that is marked as such is at Holt Avenue on the western alignment of Spofforth Street, in the North Sydney LGA.
- None of the pram crossings have associated signage. Line of sight to the crossing at Holt Avenue for traffic travelling north is regularly blocked by parked cars – see image below. This crossing is dangerous and we would not choose it when walking to the CTC.



- Pedestrians crossing at Cabramatta Road (western side) have to contend with traffic from multiple points e.g. in and out of Spofforth Street, from Cabramatta Road (eastern side), and cars making left turns out of the CTC parking garage. From a pedestrian's point of view, this is one of the most challenging intersections of the applicant's preferred route to negotiate and potentially the most dangerous – see images below.



We consider the safest, most practicable pedestrian route between the site and the CTC to use the footpath along the eastern side of Spofforth Street after leaving Holt or Rangers Avenues. This route includes crossings at Holt Avenue, Spencer Road and Cabramatta Road that are stop-signposted, subject to threshold treatment and contain pedestrian refuges; and Lindsay Lane, which is stop-signposted. None of the features of these crossings are available in the pram crossings at Holt Avenue and the western side of Spencer Road, nor in the crossing on the western side of Cabramatta Road. Finally, the safest place for a pedestrian to cross Spofforth Street to reach the CTC is at the signalised intersection of Spofforth Street with Military Road – see image below.



We consider that this safe route would exclude part, and potentially all, of the subject site from meeting the 800-metre walkability test, therefore excluding it from consideration under the Low and Mid-Rise Housing SEPP.

2. Impacts of the proposal on Holt Avenue

We are concerned that the application documents have misrepresented and downplayed impacts of the proposal to Holt Avenue in order to secure an approval.

2.1 Visual Impact Assessment

Various statements within the Visual Impact Assessment (VIA) are either incorrect or misleading:

- The claim that no part of the site falls within or near a Heritage Conservation Area (3.2, page 13) is incorrect, as the Holt Estate HCA is immediately to the north of the site.
- The VIA's assertion that "high visibility of the proposal is constrained to immediate streetscapes which are not key view locations that contribute (to) or inform the scenic value of the SPA" (6.6, page 41) fails to consider Holt Avenue's location in the Scenic Protection Area. The objectives for the SPA, as contained in [Clause 6.4](#) to Mosman LEP 2012, are:
 - To recognise and protect the natural and visual environment of Mosman and Sydney Harbour
 - To reinforce the dominance of landscape over built form
 - To ensure development on land to which this clause applies is located and designed to minimise its visual impact on those environments.

Neither the VIA nor any other application document addresses these objectives satisfactorily. In fact, the VIA admits that its findings in relation to Holt Avenue have been made **without the benefit of inspections** (7.3, page 43). This is a significant omission in the VIA.

- The VIA has failed to demonstrate that there will be **NO** visual impacts to Holt Avenue beyond a handful of dwellings on the southern side of the street. It is inexplicable that view impacts showing the development in place have been modelled for various locations on the Harbour and elsewhere in the locality, but there are **NONE** that show how the development will appear from anywhere along Holt Avenue. At a minimum, visual impacts from the proposed development should be modelled to streetscapes and homes on both sides of Holt Avenue.
- Any mitigation of visual impact that street trees might provide – and this is not adequately demonstrated in the project documentation – is significantly reduced in winter when the plane trees lose their leaves. During six months of the year, view corridors open up that would make the proposed development visible – or more visible – from Holt Avenue and areas farther north. We know this from having lived at our current address, where a plane tree on the opposite side of the street, since removed due to instability, unveiled city skyline views during winter.
- The applicant provides limited information on visual impacts of the proposal to properties backing onto Bloxsome Lane. The Design Report Part 2, at 2.6 shows four to five storeys of the western building rising above the level of the lane, a scale that is considerably bulkier and higher than existing development. Yet Part 3 of the Design report (at 6.4) attempts to downplay this impact through reference to the softening effects of plantings. What it does not show in representing views from the rear of the development – see, in particular, views A and B at 6.4 – is the level from which these viewpoints were taken. Without this detail, it

is impossible to make any meaningful assessment of impact on properties in Holt Avenue that back onto Bloxsome Lane.

2.2 Assessment of heritage impact

The Heritage Impact Statement's consideration of the Holt Estate HCA's value is grounded in falsehoods and obfuscation:

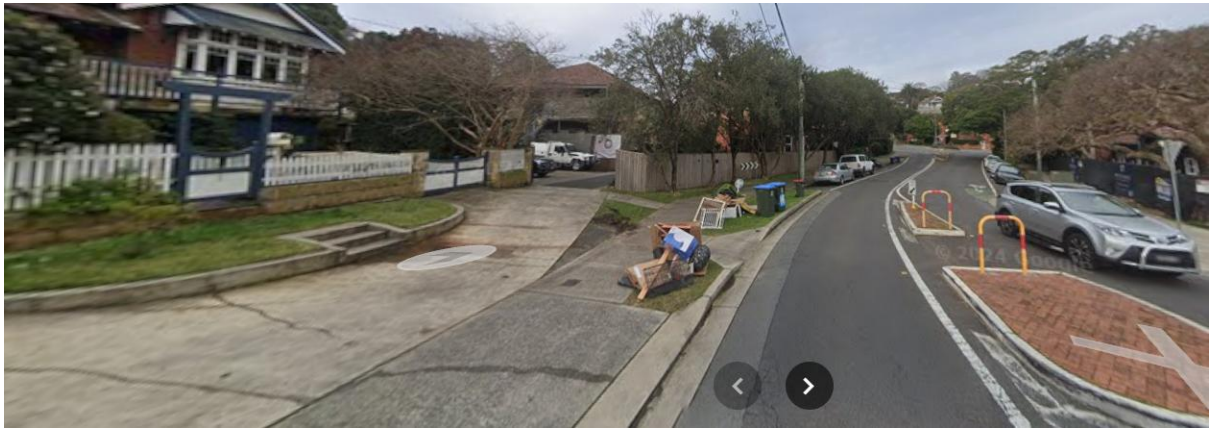
- At page 7, the HIS claims that "existing dwellings within the Holt Estate HCA towards (sic) do not offer views from the HCA towards Mosman Bay or the Sydney city skyline towards the site." This is incorrect, as even the VIA acknowledges that private view loss would occur from some properties on the southern side of Holt Avenue (refer VIA 7.3), which is further reinforced in the EIS at pages 66-67 and Figure 21.
- Also at page 7 and at pages 43 and 47 of the HIS is the assertion that "...significant public views and vistas of the Holt Estate HCA Townscape identify the key view as being from Rangers Avenue across to Mosman Bay." However, Rangers Avenue is not within the Holt Estate HCA, as the HIS' Figure 10 demonstrates.
- The HIS states at page 30 that the Holt Estate HCA "...extends further north to Prince Street." This is false: see Figure 10 of the HIS for the correct boundaries.
- The HIS acknowledges at page 43 that the proposal "does have an impact on the character of the vicinity of the Holt Estate HCA" but that "Impacts... on the HCA are mitigated through architectural design, which follows the existing topography of the area. The location of the site is behind the conservation area which also has a lane creating a further setback and the development due to this is viewed in the background setting. The view lines and nearest road within the HCA run east west within the HCA while the site is located to the south so has limited visibility from the main viewpoints." The confused logic contained in these statements underscores the HIS' scant understanding of local conditions and its inadequate response to consideration of heritage impact on Holt Avenue.
- At page 45, the HIS asserts that the "increase in the height plane (of the proposal) has an acceptable level of impact on the Holt Estate HCA." This is not demonstrated.
- The HIS concludes at 6.5, page 54, that the "proposed works will have no detrimental impact on the nearby Holts (sic) Estate HCA as the site is located to the rear of the large HCA." Given its cursory treatment of assessment of heritage impact and that much of the HIS' content is inaccurate, this report's conclusions are not credible in supporting the proposal.

2.3 Traffic and parking

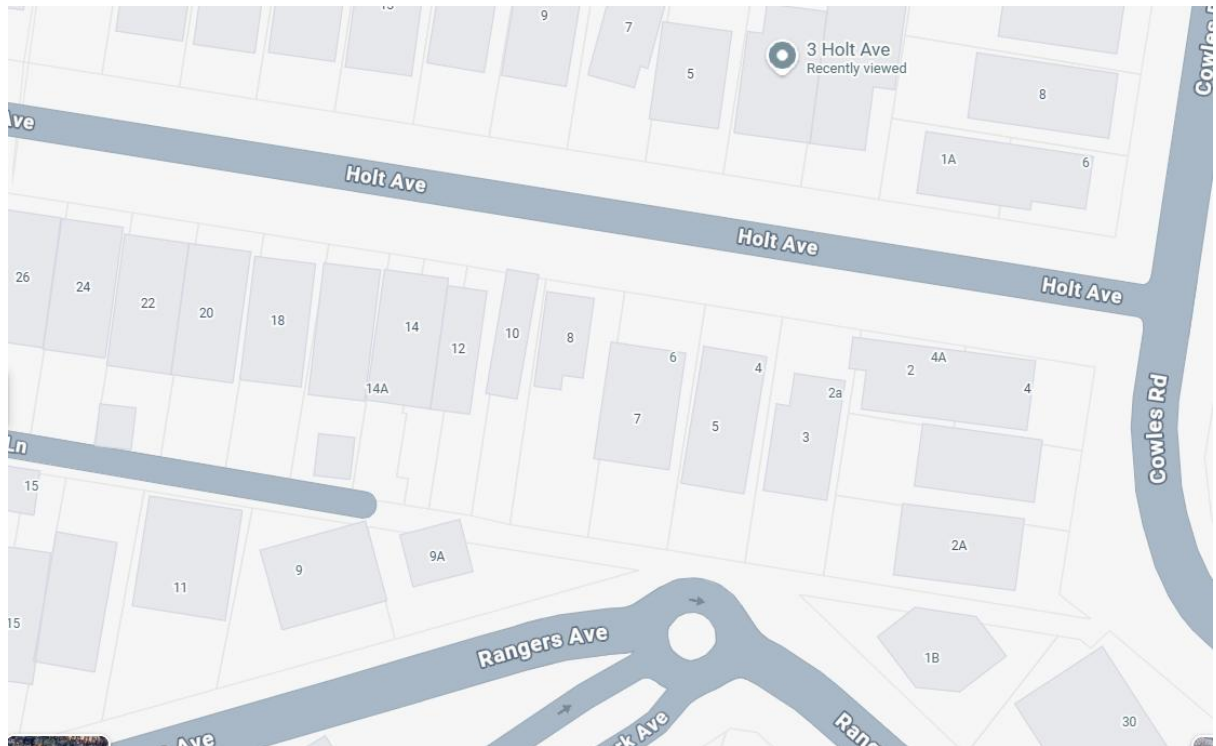
The Traffic Impact Assessment (JMT Consulting) excludes any consideration of the proposal's impacts on existing traffic and parking conditions in residential streets to the north of the site:

- On-street parking in Holt Avenue, which is already at a premium with commuters, tradies and residents jockeying for space, will worsen if the proposal goes ahead. Some houses in Holt Avenue have off-street parking provision for one car and some, including ours, have none. As the proposal intends to have pedestrian access to Bloxsome Lane, any overflow parking generated by residents and/or visitors to the site is likely to encroach on Holt Avenue in and around its intersection with Bardwell Lane. A shared

vehicle/pedestrian connection between Rangers Avenue and Cowles Road – see image and diagram below – would make the eastern end of Holt Avenue attractive to any overflow parking from the site. This is where we live and it is already difficult to find parking.



Source: Google Street View



Source: Google Maps

- We note that the proposed vehicular egress from the site favours a left-turn into Rangers Avenue. We are particularly concerned about the implications of this left turn during the construction phase of the project. The TIA mentions that 10-20 construction vehicles per day would access the site (4.3, page 23) and that these vehicles would include anything from utility trucks and vans to heavy rigid vehicles (4.6, page 24). While the applicant has suggested that such detail would be dealt with post approval (ref. Webinar with Holt Avenue residents, 10 December 2025), we would like reassurance now that no construction vehicles would use Holt Avenue either as a thoroughfare or for street parking.

3. Community engagement

There has been limited community engagement on this proposal. Most of what we have learned of the development prior to receiving notification from DPHI on 1 December 2025, has been gleaned from the activities of a street group that was briefed by the lead consultant (Urbis) and a representative of the developer in early November. The undersigned approached Urbis on 19 November asking for a similar briefing and provided a list of issues for discussion a day later. Urbis advised on 27 November that an online briefing for interested residents would take place on 3 December, only to reschedule it – at a day’s notice – to 10 December. The webinar was held one week into the two-week notification period which, for a proposal of this scale and particularly at this time of year, is woefully inadequate and reflects poorly on DPHI’s decision to allow it to happen. Many local schools closed in the first week of December and residents, generally, prepare for the holiday period during the lead up to Christmas. The applicant’s decision to agree to exhibition of this SSDA for the minimum allowable period and at a time that discourages and bypasses community engagement with the proposal, is very poor practice insofar as public engagement is concerned.

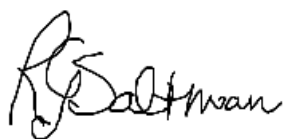
4. Conclusion

This proposal should be rejected because it:

- Most likely does not meet the 800-metre test set out in the SEPP if a safe, practicable walking route is relied upon between the subject site and Cremorne Town Centre, and should therefore be excluded from consideration under the Low and Mid-Rise Housing SEPP
- Fails to model and adequately address impacts of the proposal on Holt Avenue
- Fails to address heritage impacts of the proposal on the Holt Estate HCA
- Does not address construction traffic impacts on Holt Avenue and other residential streets to the north
- Has treated the local community with contempt in agreeing to advertise the proposal at a time that discourages community feedback.

Because of the application’s many shortcomings, it cannot be considered for approval in its current form.

Yours faithfully,



Rose Saltman and Michael Wiles
16 December 2025