

Angela and Michael Brooks  
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16 December 2025  
#SSD-96272465 – 11-23 Rangers Avenue

Dear Department of Planning,

Thank you for the opportunity to comment on the above State Significant Development (SSD) application. My husband and I are residents of Mosman residing at 26 Holt Avenue, directly behind the proposed development. We would like to formally object to the development based on several significant concerns relating to amenity impacts, traffic and safety, built form, and non-compliance with several NSW planning requirements.

This submission outlines the following planning, environmental, and policy-based concerns, concluding with the personal impacts of this proposal:

- Walking Distance and Safety
- Unreasonable Height, Bulk and Scale
- View Loss and Failure to Provide a Lawful View Sharing Assessment
- Construction, Traffic, Noise and Excavation Impacts
- Disingenuous Community Engagement
- Severe and Permanent Personal Impacts on Amenity, Privacy and Wellbeing

The following sections outline each of these issues in detail.

### **1. WALKING DISTANCE AND SAFETY**

Under Schedule 10 of the Housing SEPP, land is eligible for Low and Mid-Rise Housing only if each lot is within 800m walking distance of a town centre using a route that *“may be safely walked by a pedestrian and, where reasonably practicable, uses public footpaths and pedestrian crossings.”*

When this test is applied correctly, none of the seven lots at 11–23 Rangers Avenue comply.

#### **1.1 The Applicant Has Relied on an Unsafe and Non-Compliant Route**

To achieve a distance under 800m, the Applicant relies on crossing Spofforth Street at Holt Avenue. Spofforth Street carries high traffic volumes, and informal crossing at this location requires pedestrians to step directly into moving traffic. Both Mosman and North Sydney Councils have previously raised safety issues at this intersection. In fact, a kerb buildout was funded through the Federal Black Spot Program.

To independently assess pedestrian safety, Holt Avenue residents engaged a qualified traffic engineer to undertake peak-hour traffic counts at the Spofforth Street / Holt Avenue crossing on 4 December 2025. The survey recorded two-way traffic volumes exceeding 1,000 vehicles per hour in both the morning and afternoon peaks—levels consistent with a sub-arterial or arterial road. In the absence of any pedestrian crossing, signals or priority controls, these volumes materially increase pedestrian crossing difficulty and safety risk. Notably, the survey was undertaken after Redlands School, located around the corner, had concluded for the year, meaning traffic volumes during normal school and work periods would be expected to be higher.

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See **APPENDIX A: MCLAREN TRAFFIC ENGINEERING LETTER OF ADVICE 16 DECEMBER 2025 (F).pdf**

This intersection:

- has a kerb buildout but does not have a zebra/pedestrian crossing.
- does not give pedestrians the right of way crossing Spofforth.
- has a well-documented history of vehicular accidents and safety concerns documented by residents since 2018, many involving police, ambulance and tow-truck attendance.

See **APPENDIX B: SPOFFORTH STREET ACCIDENT RECORD.PDF**

The Housing SEPP does not allow such a route to be used when safe pedestrian crossings exist nearby, including:

- the signalised Military Road / Spofforth Street crossing, and
- the marked pedestrian crossing near Rangers Avenue/Cranbrook Avenue.

In addition, the Applicant's Walking Route 2 (shown in Applicant's **Appendix A**), which relies on Bloxsome Lane, is non-compliant due to the absence of continuous public footpaths. When safe, SEPP-compliant routes are used, the walking distance exceeds 800 metres.

### **1.2 Independent Survey Measurements Confirm the Site Does Not Comply**

Due to concerns about the accuracy of the Applicant's survey report, a group of Holt Avenue residents engaged an independent qualified surveyor to measure all realistic walking routes. See **APPENDIX C: 11-23 RANGERS AVENUE MOSMAN SURVEY REPORT DEC42025.PDF**

The findings are clear:

- Any route that uses proper pedestrian crossings results in distances well over 800m.
- Routes measured range from approximately 814m to 986m, even from the closest lot.
- Several lots on the eastern side sit even further away and cannot possibly meet the requirement.

The only routes under 800m involve unsafe, non-compliant crossings of Spofforth Street at Holt Avenue.

### **1.3 Each Lot Must Meet the 800m Requirement Individually**

The Applicant measured the distance only from 23 Rangers Avenue, treating the site as if it is already amalgamated. However, no amalgamation of the seven lots has occurred, and the Housing SEPP requires the 800m test to be applied lot-by-lot, unless the land has been legally amalgamated.

Chapter 6 (LMR areas) contains no amalgamation mechanism. Chapter 5 (TOD areas) does at section 152 (3) confirming that the absence of this clause in Chapter 6 is intentional.

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Once measured correctly and individually, none of the lots fall within a compliant walking distance. Our surveyor report measures the distances between town centre and the site on a non-amalgamated basis using pedestrian crossings.

#### **1.4 The Applicant's Surveyor Is Not Qualified to Assess Pedestrian Safety**

The Applicant relies on commentary from its surveyor, Dean Cook (LTS Surveyors), regarding what constitutes a "safe" walking route. While he is qualified to measure distances, he is not qualified to assess pedestrian safety or interpret traffic risks. Any such commentary should be disregarded.

#### **1.5 Gaps in the Traffic Impact Assessment**

The Traffic Impact Assessment fails to meaningfully address:

- traffic conditions on Spofforth Street,
- the history of collisions at Holt Avenue and Spofforth Street, or
- the documented concerns of both local councils.

On a December 10th zoom call with residents, Urbis confirmed that Spofforth Street was not within the scope of their assessment. The report also presents mapping in a way that obscures the very intersection the Applicant depends on, undermining the reliability of their conclusions.

#### **1.6 Consequence for the Proposal**

Because none of the seven lots satisfy the SEPP's 800m walking-distance requirement using safe, compliant routes:

- the site does not qualify for Low and Mid-Rise Housing under Chapter 6 of the Housing SEPP,
- the Applicant cannot rely on the LMR provisions or associated height/density bonuses, and
- the proposal must instead be assessed under standard Mosman LEP controls.

The scale of the current proposal is only achievable under the LMR framework which, once correctly applied, does not apply to this site.

## **2. UNREASONABLE HEIGHT, BULK AND SCALE**

### **2.1 Non-Compliance with Housing SEPP Height Limit**

- The Housing SEPP limits building height in the Low and Mid-Rise Housing Outer Area to 17.5 metres, or up to 22.75 metres where the full affordable housing height bonus is taken.
- While the Applicant asserts the proposal can utilise the full 30% height uplift, the Clause 4.6 table shows the development still exceeds this standard, with heights of up to 25.59 m (12.48% above the SEPP limit).

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- This exceedance demonstrates that the proposal, in its current form, would create an unreasonably dominant visual presence when viewed from adjoining properties.

## **2.2 FSR Compliance Does Not Mitigate Unreasonable Bulk and Scale**

- Although the Applicant meets the numerical Floor Space Ratio (FSR) standard, FSR only controls the *quantity* of floor area, not *form, distribution or amenity impacts* of that floor area. Section 4.15(1)(b) of the Environmental Planning and Assessment Act requires assessment of impacts such as visual dominance, sense of enclosure, view loss, interface relationships and scenic impact, regardless of FSR compliance.
- In this proposal, photomontages and architectural elevations (DA3001–DA3003) illustrate a lack of meaningful upper-level stepping or modulation. As a result, the building reads as a massive and largely unbroken six-storey wall when viewed from Holt Avenue, producing:
  - overwhelming visual dominance
  - complete loss of sky plane
  - devastating view loss of iconic Sydney landmarks
  - an oppressive sense of enclosure for neighbouring dwellings
- These impacts arise not from FSR, but from the building's height, vertical proportions and lack of transition or consideration of impact on neighbouring properties.
- The upper levels also contain substantial structures excluded from the GFA calculation — such as lift shafts, circulation spaces, rooftop plant and the lift overrun — all of which materially increase perceived bulk. These exclusions may not count toward FSR, but they significantly intensify the building's visual prominence, especially when viewed from Holt Avenue and from the C4 ridgeline.

## **2.3 Failure to Provide a Sensitive Transition Between R3 and the C4 Environmental Living Zone**

C4 Environmental Living zones were deliberately excluded from the LMR policy due to their scenic, environmental and landscape significance. Sound urban design requires a sensitive transition to adjoining low-scale and C4 conservation areas, and R3 development must therefore demonstrate an appropriate built-form response. This proposal fails to do so.

- The northern elevation presents a six-storey façade facing one- and two-storey dwellings along Holt Avenue and the C4 zone beyond. The height breach amplifies this abrupt shift in scale, eliminating any sense of graduated transition expected between the zones.
- Although the building envelope has been shifted south toward Rangers Avenue, its height still rises well above the established roofscape, so the increased setback does not meaningfully reduce perceived bulk. The northern façade remains elevated and largely unmodulated, creating a disproportionate and inappropriate interface.
- This is inconsistent with the intent of the LMR policy and with Mosman's Scenic Protection Area controls, which prioritise visual sensitivity, ridgeline character and protection of long-distance views.

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- The proposal sits at the edge of the LMR boundary, surrounded on the north, east and south by areas that cannot redevelop to a similar height or scale. The result is an isolated, oversized building with no capacity for surrounding development to absorb its scale.
- This has significant consequences for the Holt Estate Conservation Area, where scenic views and ridgeline character are fundamental elements. The EIS does not adequately assess or mitigate these impacts.
- Holt Avenue residents engaged an independent heritage consultant, Graham Brooks, whose assessment concludes that the proposal would result in significant and unmitigated heritage and visual impacts. The report identifies material deficiencies in the Heritage Impact Statement, including the failure to assess nearby heritage items and the inadequacy of proposed mitigation measures. See **APPENDIX D: OBJECTION SUBMISSION TO SSD96272465.PDF**

#### **2.4 Inappropriate Use of the SSD Pathway and Affordable Housing Provisions**

This proposal does not represent genuine affordable housing delivery and appears to rely on the SSD pathway primarily to facilitate a luxury development on a premium harbour-view site.

Specifically:

- the affordable units are provided for only 15 years, offering no long-term community benefit;
- affordable housing residents are segregated through separate access, contradicting principles of social inclusion;
- the limited affordable housing offering is not proportional to the scale of bonuses sought under the Housing SEPP;
- the developer's track record is consistent with high-end luxury projects, and the choice of this site is clearly linked to its premium harbour views, not affordable housing outcomes.

This is a misuse of the SSD mechanism and is inconsistent with the intent of the policy, which is to increase genuine, long-term, socially integrated affordable housing—not to facilitate luxury apartments with minor short-term affordable housing components.

#### **2.5 Resulting Amenity Impacts on Neighbouring Properties**

Due to the unreasonable bulk and scale, the development will severely and permanently diminish:

- Sky exposure, with the building occupying a substantial portion of the visible sky plane from all our main living spaces
- Natural ventilation, blocking prevailing breezes
- Sunlight penetration to rear, main living spaces
- Acoustic amenity, due to increased overspill and proximity of multiple dwellings
- Outlook, replacing open sky views with an 80-metre-wide wall of built form

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- Privacy, with windows and balconies on the northern façade that overlook Holt Avenue homes. The upper levels allow intrusive downward views beyond what a compliant form would permit.

For properties along Holt Avenue, this results in a permanent loss of visual relief. If approved, it would result in an oppressive enclosure of rear yards, main living areas and bedrooms, and a dramatic change to the established residential character.

### **3. VIEW LOSS AND FAILURE TO PROVIDE A LAWFUL VIEW SHARING ASSESSMENT**

The Department expressly required a “a detailed view loss and view sharing assessment having regard to the LEC principles expressed in *Tenacity Consulting v Warringah Council* [2004] NSWLEC 140 and clause 6.4 Scenic Protection of MLEP 2012.” The Applicant’s material does not satisfy this requirement and materially understates the extent and significance of view loss for Holt Avenue residents.

#### **3.1 Importance of Existing Views**

Dwellings along Holt Avenue enjoy high-value, iconic views across the subject site, including:

- the Sydney Harbour Bridge,
- Centrepont Tower, Barangaroo and the CBD skyline, and
- the land–water interface of Sydney Harbour.

Under the Tenacity principle, these views attract the highest level of planning protection, given their iconic nature and the presence of a land–water interface. These are not incidental or secondary views; they form part of the daily outlook from primary living areas and balconies, including our own.

#### **3.2 The Applicant Has Not Accurately Identified Existing Views**

The Visual Impact Assessment incorrectly claims:

*“The majority of dwellings north of Rangers Avenue do not have access to southerly views... and are unlikely to be affected by any significant view loss of merit.”*

- This is factually incorrect. Most homes directly behind the site—including ours—enjoy clear, elevated views of the Harbour Bridge, skyline, and expansive open sky.
- These are well-documented, form a central component of residential amenity and are used daily.
- The Applicant did not contact Holt Avenue residents or seek access to our properties, meaning no on-site assessment of the actual view conditions was undertaken.
- The VIA also incorrectly labels these views as “limited” or “secondary”, despite photographic evidence demonstrating that they are substantial, high-value iconic views protected under Tenacity. Please see personal view pictures in Section 6 below.

### 3.3 Application of the Tenacity Planning Principles

- We currently enjoy iconic views including the Harbour Bridge, CBD towers, and the land–water interface. Under Tenacity, these are the most valued and the most strongly protected.
- These views are obtained across rear boundaries, from primary living rooms, balconies and frequently used internal spaces. Tenacity recognises views from living spaces as highly significant and more reasonable to protect than side boundary or bedroom views.
- The proposed 6 storey structure—up to 22.75 metres (and in places 25.59 metres)—will entirely eliminate these views, replacing skyline and open sky with an 80-metre-wide wall of built form. Under Tenacity, this constitutes severe to devastating view loss. Even for properties without direct Harbour Bridge views, the existing open sky outlook provides daylight, visual relief, and a sense of openness—all of which would be eliminated.
- Tenacity makes clear that:  
*“Where an impact on views arises from non-compliance with planning controls, even a moderate impact may be considered unreasonable.”*
- In this case, the view loss is not caused by a compliant envelope. It arises directly from the building exceeding both the 17.5 m base height and the 22.75 m bonus height limit under the Housing SEPP. Because the proposal relies on—and still exceeds—bonus height, the resulting view loss is unquestionably unreasonable.

### 3.4 Errors and Omissions in the Applicant’s Assessment

The Applicant’s Visual Impact Assessment fails to:

- apply the Tenacity principles,
- identify the actual views enjoyed by Holt Avenue residents,
- assess where those views are obtained from,
- evaluate the extent of obstruction, or
- determine whether the impact is reasonable.

The Applicant also incorrectly suggests the building will function as “background built form”. From Holt Avenue, the development forms a dominant foreground mass, occupying the skyline and obstructing all significant views.

### 3.5 No Future “Complying Built Form” Would Cause Similar View Loss

- The Applicant claims that view loss may occur from *“lower, complying built form anticipated by the LMR policy”*. This claim is not supported by the current planning context of the site:
  - land immediately north is zoned C4 Environmental Living and, therefore, could not redevelop under LMR, and
  - to the south is outside the 800 m LMR walking-distance boundary so that area is also ineligible for redevelopment.
- As a result, there is no realistic future scenario in which a compliant LMR development could occur that would have the scale and visual impact of this proposal.

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- The Applicant's claim that the impacts would be an inevitable outcome of compliant future development is, therefore, incorrect.
- Critically, the unreasonableness of the view loss is not just limited to the numerical height exceedance. Even if this proposal were redesigned to comply with the maximum height limit, the overall bulk, length and lack of meaningful stepping would still cause a significant and unreasonable view loss from Holt Avenue.
- The view loss arises entirely from the scale and configuration of this proposal and would remain unreasonable even under a height-compliant design.

### **3.6 Inadequate Consideration of Scenic Protection and Harbour Views**

- Although the proposal relies on the Housing SEPP, scenic protection remains an important consideration under section 4.15(1) of the EP&A Act.
- Clause 6.4 of the Mosman LEP provides important local planning context by requiring:
  - Minimisation of visual impacts to and from Sydney Harbour, and
  - Protection of natural landform, ridgelines and scenic character.
- Notwithstanding the Housing SEPP, these principles continue to apply and should inform the assessment of whether the visual and view impacts of the proposal are reasonable in this location.
- In this proposal, the Applicant introduces a visually dominant form that interrupts the natural ridgeline, eliminates harbour and skyline views from adjoining residential areas, and creates an abrupt transition at the edge of the LMR area.
- When evaluated in the context of the site's scenic and landscape setting, the proposal fails to demonstrate an appropriate response to its prominent harbour-side location, confirming that the resulting visual and view impacts are unreasonable.

### **3.7 The View Loss Is Unreasonable**

Under both Tenacity and section 4.15(1)(b) of the EP&A Act, the view loss represents an unreasonable environmental impact, supporting refusal of the application.

- The affected views are high-value iconic views, not minor or peripheral outlooks.
- They are enjoyed from significant rooms and primary private open space.
- The impact is severe to total loss of skyline and iconic elements.
- The loss results from a non-compliant height envelope.
- The design provides no meaningful view sharing outcome.
- The development replaces open horizon with a visually overwhelming built form, inconsistent with the amenity expectations of adjoining lower-scale residential areas.

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#### **4. CONSTRUCTION, TRAFFIC, NOISE AND EXCAVATION IMPACTS**

##### **4.1 Traffic and Access Impacts**

- The scale of the development will significantly increase traffic along Rangers Avenue and surrounding streets.
- Holt Avenue is a low-density residential street with limited capacity to absorb overflow parking, visitor vehicles and deliveries.
- The Applicant's Traffic Impact Assessment focuses primarily on Rangers Avenue and fails to address likely vehicle spillover onto Holt Avenue.
- There are 91 car spaces associated with the 44 units. These additional vehicles will place enormous pressure on an already constrained local road network and directly affect daily safety and amenity.

##### **4.2 Noise and Daily Activity Impacts**

A development of this size will generate ongoing operational noise from:

- balconies and outdoor use,
- increased voices and activity,
- mechanical plant and air-conditioning units,
- waste collection, and
- basement vehicle movements.

The northern boundary is particularly sensitive, as dozens of apartments and communal areas face directly toward our property.

The scale and concentration of dwellings at this interface will introduce noise levels entirely inconsistent with Holt Avenue's low-density residential character.

##### **4.3 Construction Impacts**

- Construction impacts will be severe due to the extent of excavation, the building's height and scale, and the prolonged duration of works.
- We can expect extended periods of noise, vibration, dust and construction-related traffic.
- Our home is only metres from the site and lacks the acoustic protection of higher-density buildings, meaning these impacts will be more intrusive and harder to tolerate.

##### **4.4 Bulk Excavation Creates Significant Transport, Structural and Public Safety Risks**

- The Applicant's Geotechnical Investigation (Applicant's **Appendix S**) provides an excavation depth of approximately 8.7m but does not quantify the volume of sandstone and other rock matter that will need to be excavated. Nor does it clearly state which method will be used to excavate.
- This calculation and information is critical in being able to accurately determine the number and type of vehicles needed during the site preparation phase. As such, their Traffic

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Management Plan (Applicant's **Appendix W**) cannot accurately assess the traffic impacts on the area without this information.

- The 3-tonne GMV limit on Rangers Avenue would significantly restrict the Applicant's ability to remove sandstone and other material during excavation—let alone support ongoing construction traffic. It is not reasonable to allow high volumes of construction vehicles through a residential street that also functions as a key transport artery in the area.
- The Applicant's report does not adequately assess the impact that deep excavation will have on the cliff face along Rangers Avenue or the stability of neighbouring properties on Rangers Avenue, Park Ave and Holt Avenue.
- The information provided in Appendix S – Geotechnical Investigation and Appendix W-Traffic Management Plan is insufficient to satisfy the SEARs requirements relating to construction, traffic and public safety impacts.
- Given the seriousness of the geotechnical, structural and excavation-related impacts, these matters must be fully documented and independently verified before this proposal could be considered for approval. The Department should commission an independent geotechnical and structural review to assess the feasibility of the proposed bulk excavation and its likely impacts on traffic, public safety and residential amenity along Holt Avenue, Rangers Avenue and Park Avenue.

#### **4.5 Cumulative Amenity Impacts**

These secondary impacts compound the primary concerns of excessive height, bulk, visual dominance, view loss, privacy intrusion and ventilation loss.

Together, they create a pattern of unreasonable environmental effects inconsistent with the amenity expectations of an established residential area.

When assessed cumulatively under section 4.15(1)(b) of the EP&A Act, the traffic, noise, construction and landscape impacts support refusal of the application.

#### **5. DISINGENUOUS COMMUNITY ENGAGEMENT**

The Applicant's community engagement did not meet the SEARs requirement for meaningful consultation.

- Meetings with residents were superficial and only offered general descriptions of design intent, landscaping themes and materials without providing any substantial information.
- Despite resident requests, the Applicant did not provide drawings or elevations of the northern façade—the interface with the most significant impact on Holt Avenue homes.
- Although they clearly had a suite of drawings (given lodgement occurred shortly after the meetings), they were withheld in the meetings with residents, preventing us from assessing the true impacts of height, bulk, overshadowing, privacy intrusion and view loss.

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- Residents specifically raised concerns about severe loss of open sky, view sharing and visual impact; however, the final lodged design shows no meaningful view-sharing measures, reinforcing the impression that community feedback was neither considered nor incorporated.
- The engagement process lacked transparency, did not provide residents with information necessary for informed feedback, and appears to have been undertaken primarily as a necessary procedural exercise rather than genuine consultation.

## **6. SEVERE AND PERMANENT PERSONAL IMPACTS ON AMENITY, PRIVACY, AND WELLBEING**

The proposed development will have a profound and irreversible impact on our daily lives, wellbeing, and the fundamental amenity of our home. Our household enjoys iconic views that form part of our daily routines and connection to place. These are not incidental glimpses; they are central to how we experience and use our home.

### **6.1 Loss of Views, Openness and Natural Light**

From our main living areas, balcony and master bedroom, we currently enjoy views of:

- the Sydney Harbour Bridge,
- the city skyline,
- distant water glimpses, and
- expansive open sky.

These views were a significant reason we purchased our home in 2018. As someone who works from home, the sense of openness, daylight and connection to sky is essential to my wellbeing and mental health. Both my husband and I would be deeply affected by the persistent sense of enclosure created by this development.

This proposal would eliminate our views entirely. A 22.75-metre structure — and in parts even higher — positioned just 15 metres from our home would remove all sky outlook, obstruct natural ventilation, overshadow key living spaces, and replace our open horizon with a single dominating wall of built form.

This is not a temporary inconvenience – it’s a complete and permanent loss of the views and sense of openness that form part of our daily life. Please see pictures below.

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*Taken from the rear boundary of 26 Holt Ave, standing on the balcony  
Monday, Dec 8<sup>th</sup> @ 8:10pm*



*Taken from the rear boundary of 26 Holt Ave, standing on the balcony  
Monday, Nov 29<sup>th</sup> @ 4:42pm*

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## **6.2 Severe and Continuous Privacy Loss**

The northern façade includes multiple levels of windows, balconies and communal areas that directly overlook our rear yard and main internal living spaces. Because of the building's height and proximity, residents on several floors would have clear downward views into our balcony, living room and dining area and—most concerning—our master bedroom/study.

This impact goes far beyond a typical loss of privacy. My master bedroom is where I sleep, change, and get ready for each day, and it would be fully exposed to dozens of apartments. Even setting aside the loss of outlook and openness, I would no longer feel comfortable opening my curtains or allowing natural light in while I change or do work, as I would feel constantly watched in the most private part of my home.

These intrusive sightlines are a direct result of the building being too tall, too close and insufficiently stepped back. The outcome is a persistent, unreasonable, and deeply personal loss of privacy that fundamentally affects how we use and feel in our own home.

## **6.3 Visually Overwhelming and Enclosing Built Form**

From our rear living areas and garden, the proposed development would appear as a visually overpowering structure. Its height, width and lack of meaningful upper-level stepping cause it to read as a single monolithic form rather than a sensitively graduated interface.

This results in an overwhelming sense of enclosure, loss of visual relief, and an oppressive feeling of being overshadowed and overlooked—fundamentally altering the character of our home environment. These impacts are inconsistent with the expectations of an established low-scale residential area and undermine the amenity protections required under section 4.15(1)(b) of the EP&A Act.

No amount of landscaping can mitigate this. Most planting sits over the basement structure with limited soil depth, meaning the trees shown in the Applicant's material cannot reach the height or density needed to provide meaningful screening. Reliance on unrealistic landscaping further highlights the inadequacy of the transition between the proposed mid-rise building and the existing low-scale neighbourhood.

## **6.4 Social and Wellbeing Impacts Misrepresented by the Applicant**

The Applicant states that residents will experience only a “medium to high temporary impact” during construction. This is a gross understatement of the permanent consequences of the proposal. These effects are not temporary construction issues but long-term changes that fundamentally alter how we live in our home — including complete loss of views, permanent loss of privacy, diminished natural ventilation, and the replacement of open outlook with a seven-storey structure.

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We support well-planned development and genuine long-term affordable housing in Mosman. However, this proposal falls fundamentally short of the requirements, expectations and safeguards embedded in the Housing SEPP, the SEARs and the EP&A Act. It:

- fails to meet LMR eligibility,
- relies on unsafe and misleading pedestrian access assumptions,
- provides an incomplete and misleading visual and view loss assessment,
- disregards scenic and heritage protections,
- misuses the SSD pathway to create luxury apartments on a harbour-view site offering only short-term affordable housing benefits, and
- would cause severe, permanent and unreasonable harm to the amenity, privacy and character of the surrounding residential and heritage area.

Given the scale of non-compliance and the magnitude of environmental and social impacts, approval would be inconsistent with the public interest and with the purpose of the State Significant Development framework. We, therefore, respectfully request that the Department refuse this proposal due to its lack of merit within the planning context.

Kind regards,

*Angela Brooks Michael Brooks*

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