

NAME OF APPLICATION: 11–23 RANGERS AVENUE, MOSMAN —

RESIDENTIAL DEVELOPMENT WITH IN-FILL AFFORDABLE HOUSING

APPLICATION NUMBER: SSD Application No.: SSD-96272465

Statement: *This submission objects to the proposed development at 11–23 Rangers Avenue*

Introduction

This submission objects to the proposed development at 11–23 Rangers Avenue, Mosman, on the basis that it is over-scaled for its setting, does not satisfy key Housing SEPP LMR gateway requirements, and would cause unacceptable impacts on safety, amenity, heritage and the scenic quality of the area.

The proposal relies on technical assessments and assumptions that are incomplete or inadequately explained, particularly in relation to safe walking distance, visual and view impacts, traffic conditions, and the feasibility and risk profile of bulk excavation for the proposed basements.

Summary of objection

The proposal is for a seven-storey apartment building on a constrained ridgeline site directly adjoining low-rise dwellings in Holt Avenue, with approximately 2.5 basement levels and major excavation works.

It would materially degrade local amenity through loss of outlook and views, increased visual dominance, privacy loss and overshadowing, and it would intensify traffic and pedestrian safety risks on narrow streets already subject to congestion and constrained geometry.

Critically, the development has not demonstrated that the site qualifies for LMR “Outer Area” controls under the Housing SEPP. “Walking distance” is assessed using a route that may not be safely walked.

It fails to provide an appropriate built-form transition to adjoining C4 Environmental Living land and mapped scenic/heritage contexts.

1) The site does not qualify for LMR Outer Area controls

The application has not demonstrated that the site is within the required 800 m walking distance to Cremorne Town Centre when measured along a route that may be safely walked using, as far as reasonably practicable, footpaths and pedestrian crossings. Routes that use signposted or marked crossings (including at Spofforth–Military Road or Spofforth–Rangers Avenue) place the lots beyond 800 m, and the applicant’s reliance on an unsafe crossing at Holt Avenue/Spofforth Street is not an acceptable substitute for a safe route.

Because this “LMR eligibility” question is a gateway issue, the application should not

receive LMR uplift controls unless and until the Department is satisfied, on evidence, that the statutory walking-distance definition is met.

2) Excessive bulk, height and scale (overdevelopment)

Even where an FSR figure is met, the consent authority must still assess whether the built form is appropriate in its physical and planning context, including dominance, massing and interface impacts. The proposal's height and vertical massing (including substantial rooftop and upper-level elements that contribute to perceived bulk) would create an unacceptable, visually dominant built form when viewed from Holt Avenue, Spencer Road and the surrounding foreshore slopes.

The extent of height and mass indicates a development envelope that is not suited to this site and streetscape, resulting in an unreasonable scale jump relative to neighbouring low-rise housing.

3) Failure to transition to C4 Environmental Living and scenic areas

The site interfaces with land zoned C4 Environmental Living and areas mapped for scenic protection, which were intentionally excluded from the LMR uplift because of their environmental and scenic values. Despite this sensitivity, the proposal does not meaningfully step down or otherwise transition in built form, and instead pushes maximum height and bulk up to these protected edges.

This lack of transition is inconsistent with sound urban design practice for sensitive zone boundaries and increases the risk of long-term adverse scenic and character impacts.

4) Inadequate visual impact and view assessment

The Visual Impact Assessment is unreliable because it contains mapping/context errors and omits key viewing locations to the north, including Holt Avenue and the Holt Estate Heritage Conservation Area immediately adjoining the site. The Department requested a detailed view-loss and view-sharing assessment (including consideration of Mosman LEP scenic protection provisions and relevant Land and Environment Court view principles), and the application has not demonstrated adequate measures to minimise impacts on harbour and CBD views or to maintain the existing landform character. Without accurate viewpoints, correct mapping context and a transparent methodology, the visual and view impacts cannot be properly assessed and the application should not be approved.

5) Residential amenity impacts on Holt Avenue

The proposal would replace an established low-rise rear outlook for Holt Avenue residents with a dominant seven-storey built wall at the ridgeline, materially changing visual amenity and outlook. It would also increase privacy impacts and the sense of enclosure, and it risks additional overshadowing and adverse microclimate effects for

adjoining dwellings. These impacts are not minor or localised, given the site's elevation and the proposal's scale.

6) Heritage and streetscape impacts (including Holt Avenue trees)

The application's heritage assessment does not adequately address the Holt Estate Heritage Conservation Area context and the contributory heritage character of nearby dwellings. It also fails to properly recognise the heritage significance of the Holt Avenue street tree avenue (Heritage Item I380) and the importance of this landscape element to the streetscape character. A visually dominant high-rise form behind this heritage setting would diminish the heritage context and undermine the established garden-suburb character the controls seek to protect.

7) Traffic, access and pedestrian safety

Local streets (Holt Avenue, Rangers Avenue, Spofforth Street and connecting roads) already experience significant congestion and safety pressure, particularly during school and peak periods, and the proposal would add substantial vehicle movements from a large basement car park.

Further, the application does not convincingly address the compounding safety risks for pedestrians and cyclists on narrow, steep streets with constrained sightlines and known conflict points. In particular, the traffic documentation does not resolve the safety implications associated with the applicant's assumed pedestrian route across Spofforth Street and the broader network impacts congested in peak conditions.

8) Bulk excavation, heavy vehicles and construction feasibility

The project includes 2.5 basement levels and excavation to an approximate depth of 10 m across most of the site, implying very substantial spoil generation and prolonged excavation traffic impacts. The documentation does not provide a clear excavation volume estimate, yet this is material to understanding the number, type and duration of heavy vehicle movements required to remove sandstone, rock and soil.

Rangers Avenue is signposted with a 3-tonne GVM limit and has tight geometry and blind spots, yet the construction traffic plan contemplates rigid trucks that appear inconsistent with that constraint and would intensify safety and amenity impacts.

9) Geotechnical and structural risk (roads, cliff edge and neighbouring properties)

Given the depth and extent of excavation, there is a credible risk relating to stability of adjoining land, road infrastructure and nearby structures unless independently verified and transparently scoped. The application materials do not adequately address the cliff edge opposite the site (including potential rockfall or progressive landslip risk pathways) or demonstrate that the excavation will not compromise the integrity of Rangers Avenue, Bloxsome Lane and nearby properties, including those below the cliff line.

The geotechnical reporting scope is not transparent and appears not to squarely address near-neighbour damage risk and broader slope/road stability, which warrants an independent peer review before any approval is contemplated.

10) Infrastructure capacity and cumulative impacts

The proposal would add cumulative pressure to already constrained local infrastructure, including limited road capacity, constrained pedestrian networks and limited kerbside parking availability. These constraints are central to the site's suitability for intensified development and have not been resolved through credible mitigation commitments.

11) SSD pathway and “affordable housing” intent

While the proposal is presented as an SSD with an affordable housing component, the documentation indicates the affordable housing component operates to facilitate the SSD pathway for a predominantly market apartment development.

The internal separation of affordable housing access and amenities also raises concerns about social segregation and whether the proposal reflects contemporary best practice for integrated outcomes.

12) Community engagement deficiencies and requested independent review

The application materials indicate limited pre-lodgement engagement relative to the number of directly affected properties and the scale and sensitivity of the proposal. Given the combined impacts of height, heritage/scenic context, traffic constraints and excavation risk, the Department should require independent expert peer reviews (geotechnical/slope stability and traffic/pedestrian safety) and require corrected visual and view assessment material (including viewpoints from Holt Avenue and the Holt Estate Heritage Conservation Area) before determining the application.

Requested determination

- For the reasons above, we recommend that the application should be refused.
- If the Department is not minded to refuse, the application should be deferred pending (at minimum):
 - proof of LMR Outer Area eligibility using safe walking routes,
 - an independent geotechnical peer review addressing road/cliff/near-neighbour risks,
 - a corrected construction traffic and excavation haulage assessment consistent with the 3-tonne GVM constraint, and
 - a revised visual/view assessment that includes Holt Avenue and the Holt Estate HCA viewpoints.

Conclusion

The proposal is not a suitable or safe form of intensified development for this ridgeline location because it:

- fails a key Housing SEPP walking-distance gateway test,
- presents an unacceptable bulk/scale outcome at sensitive zone boundaries,
- relies on inadequate visual/heritage/view evidence, and
- poses substantial excavation, traffic and safety risks that are not transparently quantified or independently validated.

Accordingly, it is requested that the Department refuse SSD-96272465.