

**Submission Objecting to State Significant Development Application SSD-96272465
Proposed Residential Flat Building at 11-23 Rangers Avenue, Mosman**

Date: 16 December 2025

To: NSW Department of Planning, Housing and Infrastructure

Via: NSW Planning Portal

Dear Assessing Officer,

I am a long-term resident of Spencer Road, Mosman, living in close proximity to the northern boundary of the proposed development site at 11-23 Rangers Avenue. My property is within the Holt Estate Heritage Conservation Area. After reviewing the exhibited documents—including the Environmental Impact Statement (EIS), appendices such as the Visual Impact Assessment (Appendix CC), Heritage Impact Statement (Appendix Z), Geotechnical Report (Appendix S), Design Report (Appendix M), and Construction Traffic Management Plan (Appendix W)—I strongly object to the application. I request that it be refused or substantially revised.

My key concerns are outlined below.

1. The site is not within 800m safe walking distance of Cremorne Town Centre and does not qualify for Low-to-Medium Rise (LMR) housing controls

The applicant's proposed walking route crosses Spofforth Street at Holt Avenue, which I know from daily experience is heavily trafficked and dangerous, especially in peak hours. Safer routes using controlled crossings place the site well beyond 800m. No robust evidence supports the applicant's route as safe under the Housing SEPP. This fundamental issue disqualifies the site from LMR density bonuses. A safer route would see the nearest boundary to be more than 800m safe walking, and therefore the proposed pedestrian access on Ranger Avenue to the development to be even further.

2. No appropriate built-form transition to the adjoining C4 Environmental Living zone

The land north of the site, including Holt Avenue, and Spencer Road, is zoned C4 to protect its scenic and environmental values. The proposed building maximises height and bulk without sensitive transition, appearing as an imposing wall to adjacent properties and overwhelming the low-scale character of the Holt Avenue Conservation area and surrounding streets which are also zoned C4.

3. Inadequate Visual Impact Assessment and excessive bulk and scale

The Visual Impact Assessment is misleading and incomplete—it incorrectly describes the Scenic Protection Area coverage, omits heritage items, and provides no northern viewpoints. Even with FSR compliance, the vertical massing, height exceedances (beyond 22.75m in places), and non-GFA elements (lift overruns, plant, etc.) create unacceptable dominance and enclosure.

4. Adverse heritage impacts

The Heritage Impact Statement downplays the Holt Estate HCA's significance and omits the heritage-listed Holt Avenue street trees (Item I380). The development would form an intrusive backdrop, permanently damaging the iconic, contributory character of both Holt Avenue and Spencer Road.

5. Significant excavation and geotechnical risks

The proposed 2.5-level basement requires excavation to ~10m depth across most of

the 3,594 sqm site, potentially removing tens of thousands of cubic metres of sandstone. The Geotechnical Report's limited scope does not address risks to neighbouring foundations, stability of Rangers Avenue/Bloxsome Lane, or the cliff face opposite the site (marked by a clear "Warning cliff edge" sign, omitted from documents). Removing such support material, combined with sandstone's porosity and historical water flows (including a former waterfall nearby), raises serious risks of instability, landslip, rockfall, or flooding—threatening public safety, and properties below on Park Avenue. I request an independent expert geotechnical review.

6. Unfeasible construction traffic and impacts

The EIS and Construction Traffic Management Plan underestimate excavation vehicle movements. Rangers Avenue's 3-tonne GVM limit, narrow/windy design, and blind corners make sustained heavy vehicle use unsafe and disruptive. Rangers Avenue is a 'thoroughfare' for local traffic, particularly for peak hour morning traffic where as a resident of Spencer Road, we rely on this road as a safer route for school (Spencer to Spofforth is gridlocked in mornings due to the Redlands school traffic). I note that a weekly garbage truck significantly disrupts traffic, so I cannot imagine how prolonged construction would impact. From Spofforth St, to Avenue Road, there are 3 roundabouts – how has the developer addressed how large vehicles and cranes will be accessing the site safely and how has large vehicle queuing been addressed? Will waiting vehicles need to 'circle' through the streets of Holt Avenue and Spencer Road, both of which have traffic control structures of chicanes and speedhumps.

As a nearby resident, I am concerned about construction - prolonged noise, vibration, dust, and traffic affecting my family's health and safety, plus potential structural damage from vibration near my property and the ongoing traffic impacts of this development.

7.

Misalignment with SSD policy intent

The affordable housing component appears tokenistic, enabling a luxury complex with segregated facilities—not genuine accessible housing. While the project includes some affordable housing to qualify as SSD, it appears primarily designed as a luxury apartment complex with harbour views, segregated facilities for affordable tenants, and a developer track record in high-end projects. This does not align with the policy intent of delivering genuinely accessible housing.

The proposal represents overdevelopment with unacceptable impacts on amenity, safety, heritage, and landscape. I urge refusal or major revisions, including independent reviews and proper assessments.

Thank you for considering my submission.