Amy Watson
Director, Affordable Housing Assessments
Development Assessment & Infrastructure
Department of Planning, Housing and Infrastructure

Dear Ms Watson

RE: Objection to proposed development of 11-23 Rangers Avenue Mosman (SSD-96272465)

1.1. This submission is prepared by the owner of 28 Holt Avenue, in response to the proposed development of 11-23 Rangers Avenue (SSD-96272465) by Grand Noble Project 1 Pty Ltd (the Applicant). Our home is immediately to the north of the proposed development site. We object to the proposed development on the following ground:

1.1.1. The proposed **development site is not within the 800m "walking distance"** of Cremorne Town Centre and is therefore outside the Low and Mid Rise (LMR) outer area. On this basis alone the application should be rejected.

1.2. Notwithstanding our position that the SSD application should be rejected as the development site is not within the LMR, the SSD application should be rejected on the following additional grounds:

1.2.1. The proposed development results in **devastating view loss** from sitting and standing positions from the kitchen and family room/living area. Applying the *Tenacity* principles, the proposal is not consistent with cl. 4.3A of the Mosman LEP**.**

1.2.2. The excessive **bulk and scale** causes a significant and adverse impact on our home, and is inconsistent with the view sharing and bulk and scale provisions of cl 4.3A of the Mosman LEP.

1.2.3. The excessive bulk and scale is inconsistent with the **scenic protection** provisions of cl 6.4 of the Mosman LEP.

1.2.4. The **vibration** and noise caused by the **bulk excavation will cause structural damage to our home** and **surrounding infrastructure**.

1.2.5. **Removing the rubble from the bulk excavation is infeasible** due to the vehicle weight limitations and conditions on Rangers Avenue.

1.3. We are not opposed to the NSW Government's objective to increase housing. The properties at 11-23 Rangers Avenue are zoned R3 medium density, where residential flat buildings, townhouses and other more dense dwellings are permissible. However, based on the reasons above, SSD 96272465 should be rejected.

1.4. The applicant's EIS and annexures consist of around 1,500 pages. We have made best endeavours to review this documentation within the extremely limited 14-day public exhibition period. We may seek to submit additional supplementary information to support our submission in due course.

Supporting documents

1.5. In addition to this submission, we have included as annexures the following expert documents commissioned by several residents of Holt Avenue, including us:

1.5.1. Survey report from Survplan of a distance survey from 11-23 Rangers Avenue to Cremorne Town Centre (**Annexure A**). The survey report is provided as evidence that the proposed site does not meet the 800m walking distance requirement.

1.5.2. Letter of advice from McLaren Traffic Engineering related to the traffic conditions on Spofforth Street, and is evidence that the intersection between Holt Avenue and Spofforth Street is unsafe for pedestrians, and cannot be included as part of the calculation of walking distance (**Annexure B**).

1.6. Our submission is also supported by separate, independent submissions lodged by **GBA Heritage** and **Northern Development Assessment**, which were jointly commissioned by several residents of Holt Avenue including us.

Our home - 28 Holt Avenue

1.7. We purchased our home at 28 Holt Avenue in 2018. We were looking for a property to raise our young family and were specifically drawn to the heritage character of the Holt Estate Heritage Conservation Area, as well as the parks and natural landscapes throughout the suburb. Our home was constructed approximately 120 years ago and features a central hallway extending from the front entrance to an open-plan kitchen and living area at the southern end. All kitchen facilities, living areas, and bedrooms are located on this level.

1.8. The southern end of our home directly faces the proposed development site at 11-23 Rangers Avenue. This area comprises an expansive open-plan kitchen and living space with floor-to-ceiling windows, opening onto a balcony that extends across the full width of our property. This space serves as the primary living area for our household and for entertaining guests. Our property offers views to the Sydney CBD, including view of icons such as Centrepoint Tower and Barangaroo, as well as views toward Woolloomooloo and the Sydney Cricket Ground. These views have enabled us to observe New Year's Eve fireworks and other Sydney Harbour fireworks displays from our property over multiple years. The proposed development at 11-23 Rangers Avenue will completely obliterate these views, and negatively impact the amenity of this primary living space and our overall enjoyment of our home.

2. The proposed development is not within 800m "walking distance" of the Cremorne Town Centre, and is therefore outside the LMR area

Overview

2.1. The Applicant has failed to establish that the proposed development is within 800m *walking distance* of the Cremorne Town Centre. The definition of "walking distance" includes "a route that may be *safely walked* by a pedestrian using, as far as reasonably practicable, public footpaths and *pedestrian crossings*".

2.2. The Applicant has engaged a surveyor, Mr Cook, to measure the distance between the proposed development and the Cremorne Town Centre. The routes cross Spofforth Street at

Holt Avenue. **The surveyor did not measure any routes using the nearby pedestrian crossing** located at Rangers Avenue near Cranbrook Avenue, and at the intersection of Spofforth Street and Military Road. In addition, the Applicant's Transport Impact Assessment contains **no traffic analysis of Spofforth Street**.

2.3. Accordingly, the Applicant has failed to have regard to the available pedestrian crossings in measuring the routes. And Applicant has failed to conduct any traffic analysis of Spofforth Street to determine whether the crossing at the intersection with Holt Ave can be *safely walked*. Accordingly, it has **failed to establish** whether the proposed development is **within the low and mid rise housing outer area**. Our evidence (set out below) establishes that it clearly does not, and **the Department should reject the proposal on that basis**.

2.4. In addition, it is important to note that the surveyor (Mr Cook) is qualified to measure the distance between two points. He is not qualified to provide an opinion as to whether a particular route can be *safely walked.* That is a question for a traffic engineer. Accordingly, the surveyor is not qualified to provide any opinion as to whether the routes he has measured are "safe", the nature of the purported "pedestrian crossing" or what constitutes "adequate pedestrian safety". The Department should **disregard any opinion** he provides **regarding these issues** as they are **beyond his expertise.**

Report by LTS Surveyors (Appendix GG_Surveyor Walking Map)

2.5. The definition of "walking distance" includes "a route that may be *safely walked* by a pedestrian using, as far as reasonably practicable, public footpaths and *pedestrian crossings*". The NSW Government defines "pedestrian crossings" as being "marked by white parallel stripes on the road" and that "[y]ou must give way to pedestrians at pedestrian crossings on NSW Roads".

2.6. The two proposed routes do not include any "pedestrian crossings". The Applicant's surveyor uses language which is misleading, such as a "pram crossing", "accessible pedestrian pathways" and "pedestrian connections". These are not *pedestrian crossings.* The only instance where the surveyor refers to a "pedestrian crossing" is at Holt Avenue. However, he is mistaken as there is no pedestrian crossing on Holt Avenue.

2.7. We have obtained an expert report from a surveyor (**Annexure A**), which demonstrates that there are two pedestrian crossings that would be reasonably practicable to use: the intersection of Spofforth St and Cranbrook Ave; and the intersection of Spofforth St and Military Rd. The definition of "walking distance" requires the routes to utilise pedestrian crossings when reasonably practicable. It would obviously be reasonably practicable to use either of those pedestrian crossings when walking to the Cremorne Town Centre. **When either pedestrian crossing is used, the proposed development is not within 800m of the Cremorne Town Centre.** Therefore it is **not within the low and mid rise housing outer area.** As set out in Annexure A, the distances from Cremorne Town Centre to 23 Rangers Avenue using the suitable and safe pedestrian crossings range from 918.1m to 814.7m.

2.8. There are other errors in LTS Surveyor's report (Appendix GG_Surveyor Walking Map), such as:

(a) "All paths used are publicly accessible and clearly signposted pedestrian connections". This is incorrect. There are no signposted "pedestrian connections".

(b) Mr Cook describes the intersection of Spofforth Street and Holt Avenue as having a "pram "crossing". This is misconceived. There are kerb ramps at Holt Ave. But there is no pedestrian crossing, such as no zebra markings.

Transport Impact Assessment (Appendix BB – Transport Impact Assessment)

2.9. The report **does not include any traffic analysis of Spofforth Street**. This is a **glaring omission**, because the two proposed walking routes cross Spofforth Street at Holt Avenue. This is the critical issue. Without this analysis, the Applicant has failed to determine whether the two proposed routes can be walked safely.

2.10. JMT has given an example of a street that can be safely walked. The report provides that "Bloxsome Lane and Bardwell Lane carry very little traffic throughout the day and pedestrians have the ability to safely walk along these streets". The report goes on to state that there are "less than 50 vehicles per day" and that there are "no recorded history of crashes involving pedestrians along either of these laneways".

2.11. This can be compared with Spofforth Street.

(a) Figure 9 shows Spofforth Street has had a "serious injury" in the last five years at the very point that the surveyor has proposed to cross. We note that the key to the map almost entirely covers up the fact that there was a "serious injury" at the intersection of Holt Avenue and Spofforth Street.

(b) Spofforth Street is a **designated regional road** (see Transport for NSW's *Schedule of Classified Roads and State and Regional Roads*), which carries higher traffic volumes than a typical local residential street.

(c) The intersection of Spofforth Street and Holt Avenue has a long history of collisions. Recent upgrades to the intersection were funded under the Federal Black Spot Program. Despite this, residents have witnessed repeated crashes at this intersection for many years, often requiring the involvement of police, ambulances and tow-trucks.

(d) Figure 3 shows only one bus route travelling along Spofforth St. However, it omits the following routes: 560N, 565N, 566N, 708N, 762N, 792. In addition, there is a bus stop on Spofforth Street just before the intersection with Holt Avenue. This makes crossing even more difficult, as it reduces visibility when buses have stopped at the bus stop.

(e) We have **witnessed multiple collisions** over the years at the intersection of Spofforth St and Holt Ave. As recently as last month, we witnessed a serious accident and took the photograph below on 19 November 2025.

Image taken on 19/12/2025 at 8.10am by us, showing significant damage to two cars who collided at the intersection between Spofforth Street and Holt Avenue. Significant traffic behind the vehicles can be seen in the image.

2.12. We have also obtained a report from McLaren Traffic Engineering, which is one of Australia's leading traffic and parking experts (see **Annexure B**). The analysis demonstrates that there are more than 1,000 traffic movements during peak hour. Their independent opinion is that, based upon these volumes, **crossing at this location is unsafe.**

2.13. There are a number of decisions by the Land and Environment Court, which have considered the definition of "walking distance". The most relevant is the decision of *Ritchie v The Hills Shire Council* [2018] NSWLEC 1376 (***Ritchie***). The Court found that the proposed route could not be walked safely, because it required pedestrians to cross a busy, classified road. Instead, the Court measured the walking distance by following a walking route that utilised a pedestrian bridge and a footpath the entire way. The Court held that "*it is unsafe to require pedestrians to illegally cross a two lane classified road - outside of a pedestrian crossing in order to reach the bus stop*".

2.14. The Department should follow the decision of *Ritchie*, which is directly applicable in the present circumstances: the Applicant's proposed route would require the crossing of a busy regional road, despite the fact that there are two nearby pedestrian crossings that could reasonably practicably be used.

Conclusion

2.15. When measuring walking distance using one of the pedestrian crossings identified above, the proposed development is not within 800m walking distance of the Cremorne Town Centre. Therefore the proposed development does not qualify for the low and mid rise housing provisions under Chapter 6 of the Housing SEPP. Without access to the LMR provisions and associated affordable-housing uplifts, the Applicant cannot rely on the Housing SEPP to justify the proposed height, bulk or density.

3. The proposed development would result in devastating view loss and should be rejected. When applying the *Tenacity* principles, it is inconsistent with cl. 4.3A of the Mosman LEP

Legislative framework

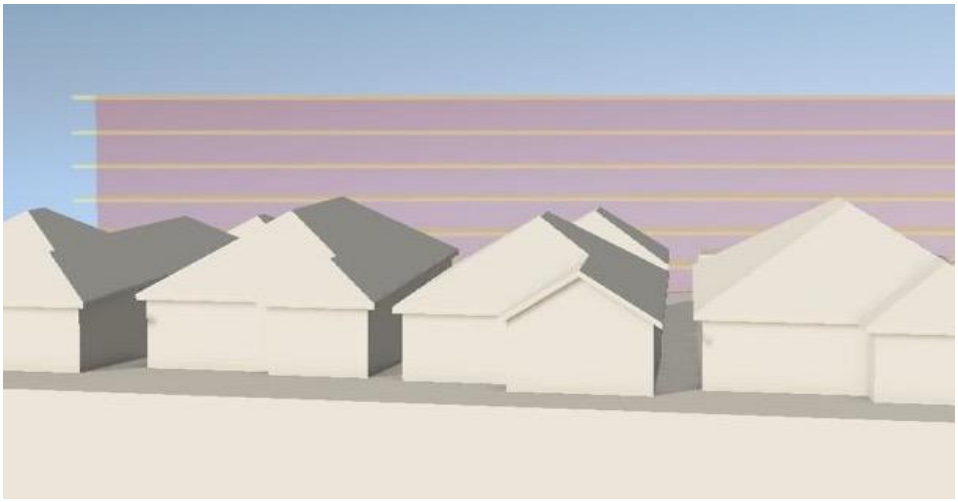
3.1. Under section 4.15 of the Environmental Planning and Assessment Act 1979 (NSW), in determining a development application, a consent authority is required to take into account provisions of a planning instrument that apply to the land to which the development application relates.

3.2. Clause 4.3A of the Mosman LEP provides that the objectives of the clause includes "(a) to provide for view sharing" and "(b) to minimise the adverse effects of the bulk and scale of buildings".

Deficient visual impact assessment

3.3. The Applicant prepared a Visual Impact Assessment (VIA) and analysed the visual impact from 7 different locations (to the south, east and west). The Applicant did not analyse the visual impact from the north of the proposed development. This is a staggering omission considering the significant impact that the proposed development will clearly have on the houses on Holt Avenue and in respect of the Holt Estate Heritage Conservation Area. As a result, both the EIS and the VIA are flawed, and the Applicant has failed to respond adequately to the site-specific SEAR.

3.4. We have obtained a relatively simple visual impact analysis from the north of the proposed site. The images below demonstrate that the proposed development would take away the entirety of the view of 28 Holt Avenue, including blocking the entirety of the CBD skyline, as well as most of the blue sky. The impact would be devastating. We note that in *Tenacity Consulting Pty Ltd v Warringah Council* [2004] NSWLEC 140 (***Tenacity***) the Court held that "*Taking it [the view] all away cannot be called view sharing…"*



Indicative image of the view loss impact from Holt Avenue, including our house.

Indicative image of the view loss impact from Bloxsome Lane, which runs between the proposed development and our home on Holt Avenue.

Application of *Tenacity* principles

3.5. Secondly, the Applicant's application of the *Tenacity* principles in relation to views is also flawed.

3.6. Step 1: assessment of views to be affected: The Applicant correctly identifies that the proposed development will affect views of the CBD skyline. Our property has views of the CBD skyline, including the iconic Centrepoint Tower.

Image taken on 11/12/2025 while standing on the balcony adjacent to our open-plan kitchen and living area. Views of Centrepoint Tower and CBD skyline are clearly visible and significant. We will be entirely deprived of these iconic views, as well as views of the sky by the massive and imposing bulk and height of the proposed development.

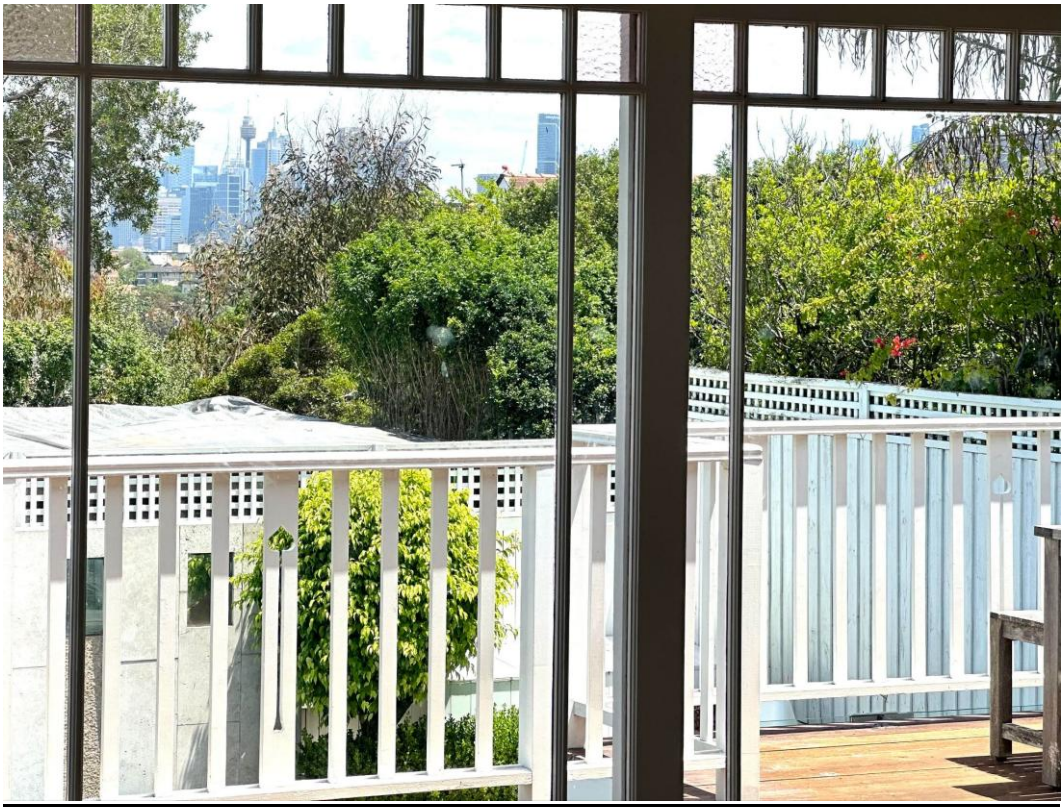


Image taken on 11/12/2025 while standing inside our open plan- kitchen and living area. Views of Centrepoint Tower and CBD skyline clearly visible and significant. We will be entirely deprived of these iconic views, as well as the sky by the massive and imposing bulk and height of the proposed development.

3.7. Step 2: from what part of the property the views are obtained: The report incorrectly states that the "remaining five properties [including 28 Holt Avenue] currently have access to sections of Sydney CBD skyline and Harbour Bridge from upper level living areas…. Views to be lost is likely to include scenic features and potentially from higher order rooms in dwellings" [emphasis added]. Insofar as 28 Holt Avenue is concerned, these statements are clearly incorrect. Our only living areas are on one level, which are accessible via the front ground-level front entrance of our home. As noted, our central hallway flows directly from the front door to our back open-plan living and kitchen area.

3.8. In our home, the bedrooms face north, while the kitchen and living room face south. Accordingly, we enjoy views of the CBD from the kitchen and living room across the rear boundary of our home. Those views are the same regardless of whether standing or sitting.

(a) Every morning, our children sit at the kitchen island eating their breakfast while we prepare their school lunches on the other side of the bench. We look south out over the trees and over the roofs of the neighbouring properties to the CBD skyline.

(b) On Mondays, our parents pick up our children from school and bring them home. While we prepare dinner, the grandparents and grandchildren sit in the living room looking out over the CBD skyline chatting, reading and playing card games, like Uno. My dad has often looked south towards and has remarked "this room just makes the house".

(c) We also have a substantial deck that faces southward, which includes a barbeque and an outdoor dining table and benches. We regularly have mid-week dinners on the deck and weekend lunches. There is nothing more enjoyable than spending time with the family over a meal while outside enjoying the view of trees, rooftops, sky and CBD skyline.

(d) Each year since we moved into our home, we have hosted a New Year's Eve barbeque with our friends and their kids. We sit on the deck and have dinner, and then watch the fireworks. Each time, we take photos of the kids standing on the balcony. We look at these photos and watch the kids grow older over the years with the background of the CBD and fireworks in the background (see photo below).

Image taken from balcony adjacent to open-plan living area at 28 Holt Avenue on 31/12/2024, showing extensive visibility of New Years Eve fireworks across Sydney Harbour from a standing position. We will be deprived of all of this scenery and enjoyment – the fireworks, the CBD and inconic sites, and almost all of the sky visible in the photo – by the massive and imposing bulk and height of the proposed development.

3.9. <u>Step 3: extent of the impact:</u>

(a) The Visual Impact Assessment makes a number of false statements, which are contradicted by the images we have provided above.

(i) "The majority of dwellings north of Rangers Avenue do not have access to southerly views over and above existing development and are unlikely to be affected by any significant view loss of merit."

(ii) "Potentially affected views are characterised by a foreground of neighbouring residential development, vegetation and long distance views to parts of the Sydney CBD typology including, in some instances, the Sydney Harbour Bridge."

(iii) "It is unlikely the proposal will align with icons, dominate or block a wide extent of scenic compositions available."

(iv) "The existing dwellings within the Holt Estate HCA towards do not offer views from the HCA towards Mosman Bay or the Sydney city skyline towards the site… The view lines and nearest road within of the HCA run east west while the site is located to the south so has limited visibility from the main viewpoints." [Heritage Impact Statement, pp. 7-8].

(b) The Applicant has deliberately not undertaken a visual impact analysis from the north of the proposed development. However, the architectural plans indicate that there is a single building with an unbroken 70-metre-wide wall. The architectural plans show that there is no break in that wall for storeys 1 to 5, which is 17.2-metres high. The only gap is at the penthouse level, however, the plans demonstrate that those small gaps will be filled by trees.

(c) The architectural plans and the above images clearly demonstrate that the proposed development would have a devasting impact on our views. It would result in a complete loss of the CBD skyline and the Centrepoint Tower, as well views of the sky. It would be replaced with a 70 metre wide and 22.75 metres wall-like form.

(d) The proposed development is not going to share our view by taking some of it away for its own enjoyment. Instead, the **Applicant is proposing to take the entirety of our view away**. As established in *Tenacity*, **taking all of a property's view cannot be called view sharing**.

(e) The proposed development would not only obliterate our views, it would have a devastating impact on our enjoyment of our home. As set out above, the heart of our home is centred in the kitchen, living room and table on the deck. This is where three generations of our family gather together. It is where we spend time with each other and prepare our meals. The table on the deck is also where we socialise with our friends and build life-long memories. If the proposal goes ahead, it will strip the heart from the house. It is not only the fact that we will lose our views. But the views will be replaced with bedrooms and balconies overlooking our kitchen, living room and deck. We will no longer want to gather in those areas to spend time with family and friends.

3.10. Step 4: why the proposal is unreasonable:

(a) The **proposed development does not comply with the applicable height development standard** under the Housing SEPP, even after applying the full 30% affordable housing bonus. The impact on our views arises as a result of the non-compliance with planning controls. The loss of iconic views of the CBD skyline and Centrepoint Tower are therefore unacceptable. As a result, the proposed development's severe impact on our view loss is unreasonable.

(b) If the development proposal complied with planning controls (which it does not), the question would be asked whether skilful design could provide the applicant with the same development potential and amenity and reduce the impact on the views of neighbours. The Applicant is seeking to build 44 luxury apartments. Other than the affordable apartments, the floorplans of the apartments are comparable to a freestanding house. For example, the Applicant is seeking to demolish 7 houses. Yet levels 2 to 5 have only 6 apartments on each floor. A more skilful design could easily provide the Applicant with the

same development potential without the devasting view loss that will result from the proposal.

4. Excessive bulk and scale fails to meet cl 4.3A of the Mosman LEP

4.1. The Applicant has failed to address the requirements of clause 4.3A of the Mosman LEP regarding bulk and scale, as requested by the Department.

4.2. The Applicant is proposing to build a seven-story apartment block that is defined by a 70-metre-wide unbroken wall-like form that is over 22 metres in height. The proposed building would be unique in Mosman. While there are apartment blocks in Mosman that are taller than 22 metres, there are none that have an unbroken 70-metre-wide wall. This apartment would be unlike anything in Mosman. As a result, it is not compatible with other built forms in Mosman, let alone within the Scenic Protection Area.

4.3. The proposed development would create **a very high level of visual effects in close and medium distance views**. In addition, the visual environment does not have the capacity to absorb the visual change proposed. Because of its scale and the fact that it is perched on a hill overlooking a cliff, there is no capacity for the vegetation to block the effects across the visual catchment.

4.4. The bulk and scale impacts are exacerbated by the fact that the proposed development **exceeds the maximum permissible height**, even after applying the full affordable housing bonus. The height breach results in an additional level of mass being added above the permitted height, which amplifies the perception of visual dominance, deepens the sense of enclosure and materially increases the extent of view loss. This demonstrates that the unacceptable bulk and interface impacts are directly attributable to the Applicant's failure to comply with the height development standard. As a result, the built form outcomes are unreasonable.

4.5. The bulk and scale will have **significant impacts on the amenity of our home**. One of the reasons were attracted to the house is that there is a long hallway that runs north to south. On hot days when working from home or on the weekends, we like to open the front door and slide open the back door of the living room. In doing so, we get cross-ventilation and can cool our house. On a hot summer's day, a southerly buster picks up in the afternoon and cools our home, without the need for expensive air-conditioning. The proposed development (with its 70-metre-wide unbroken wall) would completely block any breeze coming from the south and would cut off any cross-ventilation. This would require us to incur costs in cooling our home. It would also significantly impact the enjoyment of our home over summer, as it would become stifling inside the house.

4.6. The Applicant submits that the "proposal is an early LMR development, and will therefore differ in scale from existing low density development. Visual effects will be experienced in the short term until future LMR developments of equivalent bulk and scale are constructed."

4.7. This statement is misconceived. In terms of scale, it would dwarf the single and two-storey houses that surround the site. Importantly, the properties located to the north, south and east of the proposed site are either outside the LMR[1] or are zoned C4 - Environmental Living, which is a conservation zone. Accordingly, they will remain low density development into the future, without the possibility for higher density. There will be no future LMR developments

[1] We note that the proposed development is also outside the LMR.

of equivalent bulk and scale located to the north, east or south. The only potential future LMR development is to the west of the proposed site. However, we understand that 25 Rangers Ave opposes the proposed development.

4.8. There is also an **absence of a suitable and sensitive transition from our home**, which is essentially a single storey dwelling (we have a laundry, additional bathroom and storage space under the entry level floor of our house). Good urban design principles would demonstrate appropriate stepping down and transitions from a larger building bulk to low-scale dwellings, particularly in a heritage conservation area. There is a complete absence of any transition, with the exception of the penthouse apartments.

4.9. In addition, the Applicant submits that the "LMR policy anticipates significant visual effects and varying levels of visual impact. This circumstance is a weighting factor relevant to the overall impact of this proposal". Again, this is misconceived. First, the proposal development is not located within the LMR. Secondly, the LMR policy is completely silent on the visual effects and visual impacts of buildings. There is nothing in the policy that addresses this issue.

4.10. The design of the proposed building also **raises significant privacy considerations**. The **proposed landscaping is completely inadequate**. As the back garden will be built on a basement carpark, the level of soil is shallow and it is highly unlikely any of the proposed trees will reach full maturity or height. The low walls along Bloxsome Lane at the north of the proposed development are too low, and cannot provide adequate privacy and mitigate noise from the proposed development for the residents of Holt Avenue. We are particularly concerned that according to our understanding of the design report, the affordable housing units will face north, with living rooms directly opposite the homes on Holt Avenue. This is completely unacceptable, and will significantly and adversely impact the privacy of our home, as well as the homes of our neighbours on Holt Avenue. Living areas must not face north.

4.11. The height and bulk of the proposed development would also significantly and adversely impact access to sunlight for our south-facing rooms which include our main living and kitchen area.

5. Scenic protection

5.1. Clause 6.4 of the *Mosman Local Environmental Plan 2012* (**Mosman LEP**) provides that the objectives of the clause are as follows: "(a) to recognise and protect the natural and visual environment of Mosman and Sydney Harbour, (b) to reinforce the dominance of landscape over built form; and (c) to ensure development on land to which this clause applies is located and designed to minimise its visual impact on those environments".

5.2. Clause 6.4 applies to land identified as "Scenic Protection Area" (link to map). The proposed site falls within the Scenic Protection Area. As a result, the proposed development must be consistent with the objectives articulated in clause 6.4.

5.3. The Visual Impact Assessment (**VIA**) (link) demonstrates that:

(a) the proposed development would dominate over the surrounding landscape; and

(b) has not been designed to minimise its visual impact on the Scenic Protection Area.

5.4. This is clear from page 76 of the VIA:

5.5. This image clearly demonstrates that the **proposed development will tower over Mosman Bay**. The building will **dominate the surrounding landscape**. In doing so, it will negatively impact the intrinsic scenic quality of Mosman Bay and the Scenic Protection Area.

5.6. The image starkly demonstrates the contrast between the surrounding green trees on either side of the proposed development, separated by an overbearing 7 storey apartment block. In particular, we note that the other houses and apartment blocks are covered by the surrounding foliage. In contrast, the proposed development would completely stick out like an outcrop.

5.7. Furthermore, the image clearly shows that:

(a) Visibility to the proposal from locations such as Mosman Bay Marina, Mosman Bay Wharf and Cremorne Reserve Path is not limited to upper edges of the roof form. **Almost the entirety of the building would be visible**.

(b) Very little, if any, of the proposal is blocked by vegetation and intervening built form.

(c) There is no built form of similar bulk and scale anywhere near the proposed development or within the Mosman Bay more generally. We note that these areas will not be within the scope of the LMR, and assessments such as the following from the Visual Impact Assessment are wholly misleading "given that the proposal is an early LMR development within this visual context . . . [t]he difference in scale will be experienced in the short term, until such time as subsequent LMR developments are constructed and visual effects are reduced" (see VIA p. 40). The areas to the north, east and south of the proposed development are out of scope of the LMR and will not experience significant change to bulk or height.

6. The vibration and noise caused by the bulk excavation will cause structural damage to our home and surrounding infrastructure. Transporting the rubble from the bulk excavation is infeasible due to the vehicle weight limitations and conditions on Rangers Avenue.

6.1. The applicant is proposing to build a 2.5 level basement area for parking, waste storage and services. Based on a review of the Environmental Impact Assessment (EIS), the excavation will be to a depth of around 10m. We note that the site area is 3,594 sqm, and the basement appears to cover the majority of the proposed development site (see images below).

6.2. The applicant has not provided any information confirming the amount of sandstone that would be excavated during the bulk excavation or site preparation phase of the project. However, it would be at least approx. 30,000 cubic metres (based on 3,000sqm x 10m). It is not possible to determine the magnitude of the excavation required, or the traffic implications of removing the debris from the site without this calculation.

Indicative illustration of the depth of the basement carpark, and that it goes to the boundaries of Bloxsome Lane and Rangers Ave. Source: Appendix M - Design Report Part 2 .

Shows the basement carpark will take up almost the entire area of the proposed site. Source: Appendix B_DA Drawing Set

Traffic concerns

6.3. The Applicant estimates that during the construction phase there will be around 10-20 vehicles on a typical day (see EIS p. 74). However, there is no estimate as to the number of vehicles during the site preparation and excavation phase. The Construction Traffic Management Plan (Appendix W) states that the applicant intends to use: 2.5m Heavy Rigid Vehicles; 8.8m Medium Rigid Vehicles; 6.5m Small Rigid Vehicles; utes and vans. However, Rangers Avenue has a Gross Vehicle Mass (**GMV**) limit of 3 tonnes. This is clearly demonstrated by signs on either end of Rangers Avenue warning drivers of this limit. Rangers Avenue has a significant bend at the mid-point and a blind corner, as well as 25km speed limit at this point.

6.4. The vehicles that the applicant proposes to use (other than utes and vans) all exceed the 3 tonne GMV limit. As a result, the applicant needs to demonstrate how it can comply with the 3 tonne GMV limit during both the excavation and construction phase. If it cannot comply with the 3 tonne GMV limit, then it needs to demonstrate that Mosman Council consents to the proposed vehicles using Rangers Avenue that exceed the 3 tonne GMV limit.

6.5. In addition, it is likely that a huge amount of damage would be caused to road infrastructure during excavation and construction. Rangers Avenue is a busy road (with a 25 km speed limit) and the roundabout at the intersection of Rangers Avenue and Park Avenue is very narrow, as is the roundtable at the intersection of Rangers Avenue and Avenue Road. As a result, there are significant concerns in relation to the safety of large construction vehicles travelling along Rangers Avenue. The applicant has not given sufficient consideration to the safety in design aspects.

Structural concerns

6.6. We are also concerned the applicant's documentation does not provide adequate reassurances that structural implications have been properly considered.

6.7. First, the geotechnical report does not identify an appropriate excavation method for the site. Various methods are referred to, however, no adequate assessment is made regarding potential impacts on neighbouring properties. Given the sandstone conditions and the extent of the excavation, it is clear that this will have a significant impact. Productive methods like ripping and rock hammers are likely to cause excessive vibration and noise. The suggestion in the report seems to be that the methodology can adapt to what is encountered during excavation. However, this should be done in advance via good design. Before any decision is made to approve the application, the applicant should be required to validate the appropriate excavation method, instead of seeking to deal with it in the field. The excavation phase may become excessively disruptive and long, if less intrusive methods need to be used.

6.8. Secondly, the geotechnical report provides that there may be a need for temporary or permanent rock anchors. This report acknowledges that this would require the consent from adjoining owners (see p 17: "*If temporary anchors extend beyond the site boundaries, then permission from the neighbouring properties would need to be obtained prior to installation*"). It is concerning that the geotechnical design is so uncertain. As the owners of 28 Holt Avenue, we will not consent.

6.9. Thirdly, the zone of influence from vibration/settlement is stated to be 2x the excavation depth. This extends to 20m from the boundary. It is critical that this be modelled and the impact on neighbouring properties be assessed. It is a glaring omission not to address this.

6.10. This is important because the applicant fails to recognise that there is a cliff edge directly opposite the proposed site on Rangers Avenue (this is despite a conspicuous warning sign directly opposite the entrances to 11-23 Rangers Avenue (see image below). Neither the survey plan, design reports or geotechnical report acknowledge the cliff edge, or that there are properties at the base of the cliff. As such, there appears to be no assessment in regard to whether the bulk excavation works could destabilise the cliff, cause progressive landslip, or damage Rangers Avenue.

6.11. In particular, there is an apartment building on the other side of Rangers Avenue, constructed on pillars (see the image below). The apartment is within the zone of influence from vibrations. The applicant should be required to consider whether the excavation and construction will cause structural issues to the apartment block.

6.12. We have similar concerns arising from the Noise and Vibration Report (Appendix V). The Department should undertake a thorough review and seek and independent assessment of the noise and vibration impact of the scale of the excavation that would be required to build the 2.5 level basement carpark.

Image showing sign warning the public of the cliff edge, located immediately opposite 11-23 Rangers Avenue (taken on 12/12/2025).

Image illustrating buildings at the base of the cliff edge on Park Avenue, some constructed on pylons that would be vulnerable to strong vibrations caused by bulk excavation works (taken on 12/12/2025).

Bulk excavation concerns

6.13. We are also seriously concerned about the bulk excavation. They appear excessive, and risk creating structural damage to our home through excessive vibrations, as well as substantial noise and disruption. The report notes the existing footings of neighbouring homes to be one of the main geotechnical issues with the excavation worked required to proceed with the proposed design.

6.14. We also do not believe the applicant has properly assessed the footings of adjoining homes, such as ours. Without this, we do not see how a reasonable assessment can be made regarding the geotechnical feasibility of the proposed development.

6.15. Notwithstanding our objections, under no circumstances should rock hammers be utilised. As implied in the geotechnical report (Appendix S), these could present unacceptable risk of damage to neighbouring properties. Any excavation must be undertaking using smaller devices as while these will be less predictive, so that “they would reduce or possibly eliminate risks of damage to adjoining properties through vibration effects transmitted via the ground” (see p. 13 of Appendix S).

Mitigation measures

6.16. We reject the proposal to mitigate for this through dilapidation reports which is wholly inadequate, and gives no assurances that there will not be substantial damage to our home (p. 12). Notwithstanding our view that this proposed development has no merit and should not proceed, we request that the applicant provides enforceable assurances that the special purpose vehicle they have established for this project has adequate finances to ensure they can compensate us, and other parties, for any damages caused through the bulk excavation as well as through the duration of the project. We also fail to fundamentally understand how the Department could approve a development that has a high risk of causing significant structural damage to our home, and the home neighbouring properties. We would not be permitted to put on a second-storey addition if there was a high risk that it would damage our neighbour's property. And yet the applicant is proposing excavation techniques that will significantly damage our home.

6.17. Given the omission of 1) the volume of sandstone and other matter to be excavated to make way for the 2.5 level basement carpark; 2) information about the cliff edge, we have no confidence that the geotechnical report can be validly assessed. **At a minimum, the geotechnical report must be extensively revised, assumptions validated, excavation impact modelled, and resubmitted**.

6.18. Given the structural and safety concerns we have raised, the Department is on notice and has a duty to ensure it either has departmental experts, or otherwise seeks independent expert advice, to review the applicant's geotechnical report, and also undertakes a separate site assessment to determine the safety and feasibility of the bulk excavation - with regard to traffic implications, potential structural damage to neighbouring homes on Holt Avenue, Rangers Avenue and Park Avenue, as well as damage to Rangers Avenue. It is unreasonable for the Department to make a determination on this SSD proposal without this information.

7. Additional inaccuracies or incomplete assumptions

7.1. The **Transport Impact Assessment** (Appendix BB) fails to provide the date of the traffic count at the intersection of Rangers Avenue and Park. All that is provided is that it was taken in "September". The Applicant must provide evidence of the date this was undertaken, to ensure this was not during a school holiday period or weekend, which is not reflective of typical peak hour periods.

7.2. The Applicant has not undertaken adequate **community engagement**. Despite claims that some changes were taking into consideration, such as to landscaping, the Applicant has undertaken community engagement so close to the submission of the SSD application that no meaningful consideration could be given to our concerns, or the concerns of other community members.

7.2.1. 14 October 2025: we received notification that the Applicant would seek SSD approval to build a six storey building of 44 apartments.

7.2.2. 29 October 2025: After some delay, Urbis contacted us to confirm a face-to-face meeting with the development's project team.

7.2.3. 3 November 2025: Meeting was held at Urbis' offices with neighbours from two other homes on Holt Avenue. The project team undertook to provide us with additional information in writing.

7.2.4. 21 November 2025: Despite several follow-up enquiries, it took three weeks for Urbis to send us responses to the questions raised during the meeting on 3 November.

7.2.5. 27 November 2025: We received notification that the SSD application would shortly go to exhibition.

7.2.6. 10 December 2025: Urbis held a Zoom community consultation call, which we joined. During the call, it was not possible to see who else was on the call, other than the presenters from the project team. Questions had to be submitted via the Q&A function, and for much of the call, questions from other participants were not visible to me. We note many unanswered questions were marked by Urbis as answered, which was misleading.

7.3. We note there was less than a month between the first face-to-face meeting, and when the Applicant would have submitted all of their documentation for the SSD application. This demonstrates the Applicant was at a very advanced stage of their project when they engaged with the community, demonstrating that it's unlikely that any community considerations could have been meaningfully incorporated into the design or other elements of the project.

7.4. The **Social Impact Assessment** (SIA) report (Appendix Y), prepared by April McCabe, Partner and Director at the Planning Studio, is invalid, or at the very least incomplete and should be revised and resubmitted. The report includes a table (see pp. 22-23), which responds to the questions outlined in the NSW Government guidelines and indicates where the required information sits within the report.

7.5. The except from the table below notes that the author of the report did not undertake community engagement, yet then claims that views of affected and interested people influenced the project design and each element of the SIA report. This seems impossible, and raises serious concerns about the robustness of the analysis, and validity of the report given the assessment did not include critical evidence to make a reasonable assessment. This is an incomplete assessment, and the SIA report should be revised and resubmitted, this time clearly setting out what community engagement was undertaken and by who.

Community Engagement		
12	Were the extent and nature of engagement activities appropriate and sufficient to canvass all relevant views, including those of vulnerable or marginalised groups?	Engagement undertaken by another qualified consultant.
13	How have the views, concerns and insights of affected and interested people influenced both the project design and each element of the SIA report?	Yes [Social Impact Assessment]

ANNEXURE A

0420 944 413
matt@survplan.com.au

abn. 83 914 613 296

Mob: 0420 944 413
Email: info@survplan.com.au
ABN: 59 578 257 869

Our Ref: 25-639

4 December 2025

Attn: [redacted]

RE: 25-639 11-23 RANGERS AVENUE, MOSMAN – TOWN CENTRE DISTANCE SURVEY

In accordance with your instructions, I have undertaken a distance survey from 11-23 Rangers Avenue, Mosman to the Cremorne Bay Town Centre.

The separate routes have been measure by ;

Route 1. Via Military Road traffic lights to Rangers Avenue:
Commence at the northeastern corner of SP12731, cross at the traffic lights on Military Rd and Spofforth, walking down Spofforth, turning left at Rangers Avenue and continuing until reaching just within the closest boundary of each of the properties between 11-23 Rangers Avenue.

Route 2. Via Military Road traffic lights to Bloxsome Lane:
Commence at the north-eastern corner of SP12731, cross at the traffic lights on Military Rd and Spofforth, walk down Spofforth, turning left onto Holt Avenue, then continuing until reaching Bardwell Lane, turn right onto Bardwell Lane, then left onto Bloxsome Lane and continue until reaching just within the closest boundary of each of the properties between 11-23 Rangers Avenue.

Route 3. Via Spencer Road to Rangers Avenue:
Commence at the end of the driveway of SP71826 (the driveway's street access point is on Spencer Road - please measure from the south-eastern end of the driveway). Walk down Spofforth, pass the roundabout, cross over the pedestrian crossing, walk to Rangers Avenue, cross to the northern side of Rangers Avenue, then continue down Rangers Avenue until reaching just within the closest boundary of each of the properties between 11-23 Rangers Avenue.

Route 4. Via Spencer Road to Bloxsome Lane:
Commence at the end of the driveway of SP71826 (the driveway's access points is on Spender Road - please measure from the south-eastern of the driveway). Walk down Spofforth, pass the roundabout, cross over the pedestrian crossing, walk up Spofforth, turn right onto Holt Avenue, continue until you reach Bardwell Lane where you turn right, then turn left onto Bloxsome Lane and continue until reaching just within the closest boundary of each of the properties between 11-23 Rangers Avenue.

0420 944 413
matt@survplan.com.au

abn. 83 914 613 296

Route 5. Via Spencer Road to Rangers Avenue:
Commence at the southeastern corner of SP79706 on Spofforth Street Walk down Spofforth, pass the roundabout, cross over the pedestrian crossing, walk to Rangers Avenue, cross to the northern side of Rangers Avenue, then continue down Rangers Avenue until reaching just within the closest boundary of each of the properties between 11-23 Rangers Avenue.

The calculated distance, as shown in the accompanying sketch, is shown in metres +/-50mm. Please see the attached plan for further information.

This report has been prepared for the exclusive use of Angela Brooks only. No liability for loss howsoever arising can be accepted from other persons seeking to rely upon the information contained herein.

Regards,

Mitchell Eves

Type text here

L.G.A. : NORTH SYDNEY / MOSMAN
PARISH : WILLOUGHBY
COUNTY : CUMBERLAND

MGA

MILITARY ROAD
SP12731
SP71826
SP79706
STREET
SPOFFORTH
SPENCER ROAD
CABRAMATTA ROAD
SPENCER ROAD
BARDWELL LANE
HOLT AVENUE
BLOXOME LANE
RANGERS AVENUE
No. 23
No. 21
No. 19
No. 13
No. 11

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LEGEND

- ROUTE 1 (SEE SHEET 2)
- ROUTE 2 (SEE SHEET 3)
- ROUTE 3 (SEE SHEET 4)
- ROUTE 4 (SEE SHEET 5)
- ROUTE 5 (SEE SHEET 6)

0 25m 50m 75m 100m 125m
SCALE 1:1250

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REVISION	DATE	DESCRIPTION	DATA REF
02	04/12/2025	ROUTES REMOVED	
01	20/11/2025	ADDITIONAL ROUTES ADDED, ROUTE 3 REVISED	2025-11-18 MO
00	10/11/2025	ORIGINAL ISSUE	2025-11-06 MO

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ABN 83 914 613 296
PO BOX 242 HELENSBURGH NSW 2508
PH 0420 944 413 Email:
matt@survplan.com.au

CLIENT: ANGELA BROOKS

PROJECT: 11-23 RANGERS AVENUE, MOSMAN, NSW

TITLE: PLAN SHOWING DISTANCE FROM CREMORNE TOWN CENTRE TO 11-23 RANGERS AVENUE

SURVEYED	DRAWN	DATE
MO	MO	04/12/2025
	CHECKED	SCALE:
	ME	1:1250

SHEET 1 OF 6 | A1 | DRAWING No. 25639001 | REV 02

L.G.A. : NORTH SYDNEY / MOSMAN
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COUNTY : CUMBERLAND

MILITARY ROAD
SP12731
SP71826
SP79706
SPOFFORTH STREET
SPENCER ROAD
CABRAMATTA ROAD
SPENCER ROAD
LANE
BARDWELL
HOLT AVENUE
BLOXOME LANE
RANGERS AVENUE
No. 23
No. 21
No. 19
No. 13
No. 11

AXIOM
MGA

ROUTE 1 DISTANCE TO No. 23 = 918.1
ROUTE 1 DISTANCE TO No. 21 = 931.6
ROUTE 1 DISTANCE TO No. 19 = 944.7
ROUTE 1 DISTANCE TO No. 17 = 959.5
ROUTE 1 DISTANCE TO No. 15 = 965.6
ROUTE 1 DISTANCE TO No. 13 = 972.7
ROUTE 1 DISTANCE TO No. 11 = 986.3
ROUTE 1 TOTAL DISTANCE = 1005.2

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0 25m 50m 75m 100m 125m
SCALE 1:1250

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PO BOX 242 HELENSBURGH NSW 2508
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CLIENT: ANGELA BROOKS

PROJECT: 11-23 RANGERS AVENUE, MOSMAN, NSW

TITLE: PLAN SHOWING ROUTE 1 DISTANCE FROM CREMORNE TOWN CENTRE TO 11-23 RANGERS AVENUE

SURVEYED	DRAWN	DATE
MO	MO	04/12/2025
	CHECKED ME	SCALE: 1:1250

SHEET 2 OF 6 | A1 | DRAWING No. 25639001 | REV 02

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PARISH : WILLOUGHBY
COUNTY : CUMBERLAND

MILITARY ROAD
SP12731
SP71826
SP79706
SPOFFORTH STREET
SPENCER ROAD
CABRAMATTA ROAD
SPENCER ROAD
BARDWELL LANE
HOLT AVENUE
BLOXOME LANE
RANGERS AVENUE
No. 23
No. 21
No. 19
No. 13
No. 11

AXIOM
MGA

ROUTE 2 DISTANCE TO No. 23 = 834.9
ROUTE 2 DISTANCE TO No. 21 = 847.2
ROUTE 2 DISTANCE TO No. 19 = 859.3
ROUTE 2 DISTANCE TO No. 17 = 871.3
ROUTE 2 DISTANCE TO No. 15 = 877.7
ROUTE 2 DISTANCE TO No. 13 = 883.9
ROUTE 2 DISTANCE TO No. 11 = 896.1
ROUTE 2 TOTAL DISTANCE = 912.9

0 25m 50m 75m 100m 125m
SCALE 1:1250

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PROJECT: 11-23 RANGERS AVENUE, MOSMAN, NSW

TITLE: PLAN SHOWING ROUTE 2 DISTANCE FORM CREMORNE TOWN CENTRE TO 11-23 RANGERS AVENUE

SHEET 3 OF 6 | A1 | DRAWING No. 25639001 | REV 02

L.G.A. : NORTH SYDNEY / MOSMAN
PARISH : WILLOUGHBY
COUNTY : CUMBERLAND

MILITARY ROAD
SP12731
SP71826
SP79706
SPOFFORTH STREET
CABRAMATTA ROAD
SPENCER ROAD
LANE
BARDWELL
HOLT AVENUE
BLOXOME LANE
RANGERS AVENUE
No. 23
No. 21
No. 19
No. 13
No. 11

AXIOM
MGA

ROUTE 3 DISTANCE TO No. 23 = 814.7
ROUTE 3 DISTANCE TO No. 21 = 831.2
ROUTE 3 DISTANCE TO No. 19 = 838.0
ROUTE 3 DISTANCE TO No. 17 = 851.5
ROUTE 3 DISTANCE TO No. 15 = 852.6
ROUTE 3 DISTANCE TO No. 13 = 859.4
ROUTE 3 DISTANCE TO No. 11 = 874.0
ROUTE 3 TOTAL DISTANCE = 887.4

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0 25m 50m 75m 100m 125m
SCALE 1:1250

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CLIENT: ANGELA BROOKS

PROJECT: 11-23 RANGERS AVENUE, MOSMAN, NSW

TITLE: PLAN SHOWING ROUTE 3 DISTANCE FORM CREMORNE TOWN CENTRE TO 11-23 RANGERS AVENUE

SURVEYED	DRAWN	DATE
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SHEET 4 OF 6 | A1 | DRAWING No. 25639001 | REV 02

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MGA

MILITARY ROAD
SP12731
SP71826
SP79706
SPOFFORTH STREET
CABRAMATTA ROAD
SPENCER ROAD
LANE
BARDWELL
HOLT AVENUE
BLOXOME LANE
RANGERS AVENUE
No. 23
No. 21
No. 19
No. 13
No. 11

ROUTE 4 DISTANCE TO No. 23 = 892.7
ROUTE 4 DISTANCE TO No. 21 = 905.0
ROUTE 4 DISTANCE TO No. 19 = 917.1
ROUTE 4 DISTANCE TO No. 17 = 929.3
ROUTE 4 DISTANCE TO No. 15 = 935.2
ROUTE 4 DISTANCE TO No. 13 = 941.7
ROUTE 4 DISTANCE TO No. 11 = 953.9
ROUTE 4 TOTAL DISTANCE = 970.7

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CLIENT: ANGELA BROOKS

PROJECT: 11-23 RANGERS AVENUE, MOSMAN, NSW

TITLE: PLAN SHOWING ROUTE 4 DISTANCE FORM CREMORNE TOWN CENTRE TO 11-23 RANGERS AVENUE

SURVEYED	DRAWN	DATE
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SHEET 5 OF 6 | A1 | DRAWING No. 25639001 | REV 02

L.G.A. : NORTH SYDNEY / MOSMAN
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COUNTY : CUMBERLAND

MILITARY ROAD
SP12731
SP71826
SP79706
SPOFFORTH STREET
SPENCER ROAD
CABRAMATTA ROAD
SPENCER ROAD
LANE
BARDWELL
HOLT AVENUE
BLOXOME LANE
RANGERS AVENUE
No. 23
No. 21
No. 19
No. 13
No. 11

AXIOM
MGA

ROUTE 5 DISTANCE TO No. 23 = 832.6
ROUTE 5 DISTANCE TO No. 21 = 848.8
ROUTE 5 DISTANCE TO No. 19 = 855.9
ROUTE 5 DISTANCE TO No. 17 = 869.5
ROUTE 5 DISTANCE TO No. 15 = 871.2
ROUTE 5 DISTANCE TO No. 13 = 879.4
ROUTE 5 DISTANCE TO No. 11 = 893.1
ROUTE 5 TOTAL DISTANCE = 905.2

0 25m 50m 75m 100m 125m
SCALE 1:1250

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PH 0420 944 413 Email:
matt@survplan.com.au

CLIENT: ANGELA BROOKS

PROJECT: 11-23 RANGERS AVENUE, MOSMAN, NSW

TITLE: PLAN SHOWING ROUTE 5 DISTANCE FORM CREMORNE TOWN CENTRE TO 11-23 RANGERS AVENUE

SURVEYED	DRAWN	DATE
MO	MO	04/12/2025
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SHEET 6 OF 6 | A1 | DRAWING No. 25639001 | REV 02

ANNEXURE B

M^CLAREN TRAFFIC ENGINEERING

Address: Shop 7, 720 Old Princes Highway Sutherland NSW 2232
Postal: P.O Box 66 Sutherland NSW 1499

Telephone: (02) 9521 7199
Web: www.mclarentraffic.com.au
Email: admin@mclarentraffic.com.au

Division of RAMTRANS Australia ABN: 45067491678 RPEQ: 19457

Transport Planning, Traffic Impact Assessments, Road Safety Audits, Expert Witness

16 December 2025 Reference: 251075.01FA

[redacted]

LETTER OF ADVICE RELATED TO THE WALKING DISTANCE ASSESSMENT AT 11 - 23 RANGERS AVENUE, MOSMAN

Dear [redacted],

Reference is made to your request to provide a Letter of Advice for the proposed walking distance assessment at 11 - 23 Rangers Avenue, Mosman. This letter has been prepared for the benefit of the residents of 18 – 36 Holt Avenue, Mosman to address the walking distance assessment completed as a part of the application for a residential flat building at the subject site relating to SSD-96272465, specifically addressing the intersection of Spofforth Street / Holt Avenue.

1 Walking Distance Assessment

LTS Surveyors undertook a survey on 11 November 2025 using high-accuracy GPS surveying equipment and physically verified on foot two (2) walking routes to determine the walking distance between the site and the Cremorne Town Centre (provided in **Annexure A**). The definition of "*walking distance*" under the SEPP Housing 2021 is below.

> *Walking distance means 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.*

Both survey routes require pedestrians to cross Spofforth Street at the intersection of Holt Avenue, which the letter accompanying the survey describes as *residential streets with adequate pedestrian safety*. The Walking Route 1 is a distance of 742m, whilst the Walking Route 2 is 668m, which does not use footpaths for the entire length.

In accordance with the definition under the SEPP Housing 2021, Walking Route 2 does not use public footpaths as Bloxsome Lane and Bardwell Lane do not have adequate public footpaths and require pedestrians to walk with the carriageway of Bloxsome Lane and Bardwell Lane.

In addition to the above, the Traffic & Parking Impact Assessment dated 19 November 2025, prepared by JMT Consulting does not critically assess the safety of pedestrians crossing at the intersection of Spofforth Street / Holt Avenue.

2 Spofforth Street / Holt Avenue Traffic & Geometric Design

2.1 Traffic Survey Data

Pedestrian crossing difficulty increases in direct proportion to the two-way vehicle volume along the road being crossed. The undersigned commissioned intersection traffic counts at Spofforth Street / Holt Avenue, where the Walking Route(s) cross Spofforth Street, on Thursday 4 December 2025. The survey data is summarised in **Table 1**, whilst full results are presented in **Annexure B**. The data shown below relates to the traffic volumes along Spofforth Street at the required pedestrian walking route location shown in **Annexure A**.

TABLE 1: SPOFFORTH STREET TRAFFIC VOLUMES AT CROSSING LOCATION

Location1	Two-Way Traffic Volume(3)	
	AM Peak Hour(1)	PM Peak Hour (2)
Spofforth Street	1,012	1,086

Note (1) 8:15am-9:15am
(2) 3:00pm to 4:00pm
(3) The summary of traffic volumes only considers traffic volumes that conflict with the pedestrian crossing route. The intersection traffic volumes are higher.

As shown above, the two-way peak hour volumes at the Walking Route crossing location exceeds 1,000 two-way vehicle trips in both the AM and PM peak hour period. These volumes are similar to what is expected along a sub-arterial or arterial road, with collector roads having thresholds of 500 two-way peak hour vehicle trips and local roads having thresholds of 300 two-way peak hour vehicle trips.

It should be noted that Spofforth Street is a classified Regional Road (No.2019) as outlined within TfNSW schedule of Classified and Unclassified Regional Roads and hence these observed traffic volumes reflect the higher order road function of Spofforth Street as a sub-arterial or arterial road.

In addition, intersection turning movements from minor roads have an influence upon pedestrian safety and gap acceptance, which are also relevant considerations to the safety of pedestrians crossing Spofforth Street.

2.2 Geometric Design and Parking Restrictions

The intersection of Spofforth Street / Holt Avenue is a four-way stop controlled intersection with Spofforth Street having priority over Holt Avenue, the relevant road geometry and characteristics of the intersection include the following:

- Spofforth Street is signposted as 50km/h with one lane in each direction;
- The Holt Avenue approaches consist of raised pavement thresholds and one lane in each direction. A localised median separating the Holt Avenue carriageway is located on the eastern approach to the intersection;
- Kerb ramps are provided at all crossing locations;
- Kerb extensions have been provided along both Holt Avenue and Spofforth Street;
- Bus zones exist to the north of Holt Avenue along both sides of Spofforth Street;

- Kerbside parking is permitted along both sides of Holt Avenue prior to the raised pavement threshold;

- Kerbside parking is permitted along both sides of Spofforth Street prior to the kerb extensions;

- The road alignment of Spofforth Street is straight with a slight downgrade;

- The road alignment of Holt Avenue on the approach to Spofforth Street is straight, with a gradient falling heading west to east.

Considering the kerb extensions provided at the proposed Walking Route, the distance for pedestrians to cross Spofforth Street is roughly 9.2m.

3 Relevant Austroads and Australian Standards Excerpts

Reference is made to *Austroads Guide to Road Design Part 4 Section 8.2.2* which states the following about pedestrians crossing roads without pedestrian refuges:

> *Without a refuge pedestrian delay can become excessive – above about 500 vehicles per hour on a single-lane each-way urban street. A refuge increases the traffic threshold to about 1800 vehicles per hour before pedestrian delay becomes excessive.*

This advice is general in nature, but it is evident that two-way volumes at the crossing location along Spofforth Street exceed 500 peak hour vehicle movements and hence further consideration is required to be made on the safety for pedestrian to cross at the intersection of Spofforth Street / Holt Avenue.

More recent analysis has been completed as a part of the June 2025 supplement to AS1742.10. Standards Australia has undertaken a detailed SIDRA analysis to determine vehicle traffic volume thresholds at which the delay that crossing pedestrians experience becomes excessive, with consideration for crossing widths, number of lanes and other relevant context.

Further, reference is made to the publicly available supplement to AS 1742.10 dated 20/06/2025 (ref #19005493), which provides the following advice:

> *Austroads Guide to Road Design Part 4 … Section 8.2.2 provides general guidance on vehicle volumes above which pedestrian delay may be excessive. Table B8.1 provides a more detailed analysis. It is considered that a maximum delay of 30 seconds for pedestrians who wish to cross a road is a reasonable time period and therefore a crossing facility is not generally warranted.*
>
> *An initial assessment of the ease with which a pedestrian is able to cross the road should be conducted to assist in determining whether further investigations and treatment is required. The delay of Level of Service (LOS) experienced by a pedestrian waiting for a safe gap in a traffic stream based on the volume of traffic is the key factor in determining if pedestrians can safely cross a road.*

Table B8.1 - Maximum volumes for Level of Service D for pedestrian crossing delay

Two-lane, two-way road:

Total road width (m)	Maximum volume (veh/hr)	
	Undivided road[1]	Divided road[2]
6	1560	3536
7.2	1290	3184
8.4	1087	2854
9.6	929	2564
10.8	804	2310
12	704	2090

Four-lane, two-way road:

Total road width (m)	Maximum volume (veh/hr)	
	Undivided road[1]	Divided road[2]
12	744	2504
13.2	653	2238
14.4	578	2014
15.6	516	1820
16.8	463	1656
19.2	380	1384
21.6	–	1176
24	–	1010

NOTES:

[1] If the peak hour volume is greater than the maximum volume indicated in the table for an undivided road, consider treatments such as narrowing the road width with kerb extensions or a pedestrian refuge.

FIGURE 1: ***TABLE B8.1 OF SUPPLEMENT TO AS1742.10***

The subject road (Spofforth Street) is a two-lane two-way road, though the total road width at the crossing location is 9.2m. It is evident from **Figure 1** above, that during peak times, the maximum traffic volume threshold is 1,087 two-way peak hour vehicles based upon an 8.4m wide road, and 929 two-way peak hour vehicle based upon a 9.6m wide road. Interpolating this data provides a maximum two-way peak hour vehicle of 981 for a 9.2m wide road.

In view of the above, both the observed traffic volumes during the AM and PM peak hour period exceed 981 two-way vehicle trips and it can be concluded that the crossing of Spofforth Street at the proposed walking route is unsafe.

It should be noted that the above relates to midblock traffic assessments, rather than an assessment at an intersection, whereby further delay to pedestrians is created due to pedestrian observations to minor road turn movements and also delays associated with turning traffic into and out of minor roads which all influence gaps within the traffic stream. Having consideration to this, maximum vehicle peak hour thresholds are likely to be less than 981 two-way peak hour vehicle trips, although not much less considering the low number of minor road turn movements that oppose the pedestrian route.

Having consideration to the above, a more site-specific assessment of the intersection has been undertaken using SIDRA in the same method as adopted by the supplement to AS1742.10 which indicate the following:

- AM Peak Hour:
    - The pedestrian delay associated with the walking route across Spofforth Street is 40.1 seconds, which is 10.1 seconds above what is deemed to be acceptable and safe for pedestrians;
    - The intersection would need to reduce traffic volumes by 10% in order to achieve the maximum acceptable pedestrian delay of 30 seconds;
    - No consideration has been made to traffic growth within the assessment. Due consideration should also be made to traffic growth along Spofforth Street to determine the impact on pedestrian safety.
- PM Peak Hour:
    - The pedestrian delay associated with the walking route across Spofforth Street is 46.7 seconds, which is 16.7 seconds above what is deemed to be acceptable and safe for pedestrians;
    - The intersection would need to reduce traffic volumes by 14% in order to achieve the maximum acceptable pedestrian delay of 30 seconds;
    - No consideration has been made to traffic growth within the assessment. Due consideration should also be made to traffic growth along Spofforth Street to determine the impact on pedestrian safety.

In view of the above, the walking route to Cremorne Town Centre has not been adequately assessed within SSD-96272465, as no regard has been made to traffic volumes at the intersection of Spofforth Street / Holt Street which is the driving factor behind the determination of pedestrian safety. Notwithstanding this, an assessment has been carried out, and it has been determined that crossing Spofforth Street as proposed by the Walking Route(s) is not safe for pedestrians considering the traffic volumes along Spofforth Street and more specifically at the intersection of Holt Avenue / Spofforth Street.

4 Safety Assessment

The undersigned has reviewed the crossing location and has determined that Spofforth Street carries too much traffic for pedestrians to safely cross. **Table 2** shows that the average delay and peak hour volumes during the AM and PM peak exceed the thresholds determined in **Section 3**.

TABLE 2: THRESHOLD EXCEEDANCE COMPARISON

Traffic Volumes (vph)	**AM Peak Hour** (vph)	**PM Peak Hour** (vph)	**AM Peak Hour** (Pedestrian Average Delay - seconds)	**PM Peak Hour** (Pedestrian Average Delay - seconds)
Data	1,012	1,086	40.1	46.7
Threshold	981	981	30	30
Result	**Exceeds Threshold**	**Exceeds Threshold**	**Exceeds Threshold**	**Exceeds Threshold**

As shown, both the traffic volumes in both the AM and PM peaks, 1,012vph and 1,086vph respectively, exceed the threshold of 981vph at which pedestrian crossing delays become excessive. In real terms, the average delay for a pedestrian to cross is 40.1 seconds and 46.7 seconds in the AM and PM peak hour period respectively which exceeds the threshold of 30 seconds. Hence, it can be concluded that pedestrians who attempt to cross Spofforth Street at this location during peak hours will experience excessive delays whilst waiting for a safe gap. This will result in either of the following outcomes:

a) the pedestrian will attempt to cross the road during an unsafe gap, reflecting a high-risk exposure level, or;

b) the pedestrians will reroute to the north to cross at the signalised pedestrian crossing at Spofforth Street / Military Road.

Option (a) fails to achieve the definition of "*walking distance*" which requires that the distance be measured along *a route that may be safely walked by a pedestrian.* Further concern is raised for elderly people, disabled people and children, who either need more time to cross (compared to an able bodied person) or have reduced perception of approaching vehicle speed, thereby needing more time to safely cross the road. The analysis in **Section 3** assumes a 1.2m/s walking speed, which these vulnerable pedestrians are not likely to achieve.

Option (b) adds approximately 170m walking distance to the route, via the signalised intersection of Spofforth Street / Military Road which increases the walking distance of Route 1 to approximately 912m and Route 2 to approximately 838m.

In either case, the site is not within an 800m walking distance as defined in the SEPP Housing 2021. It is expected that there would be no ample location to cross Spofforth Street north of Holt Avenue due to the lack of pedestrian infrastructure and likely traffic volumes being consistent or greater than that observed at the intersection of Holt Avenue / Spofforth Street.

4.1 Pedestrian Strike Risk Analysis

There is a risk of a pedestrian strike where a pedestrian accepts an unsafe gap to cross the road. Given the gaps available, it is possible that the crossing is unlikely to give an approaching enough time to stop before colliding with the pedestrian. The severity of a pedestrian strike is based on the guidance sheet as provided in the *Austroads Guide to Road Safety Part 6*, which is reproduced as **Figure 2** below that is referenced after considering both the likelihood (refer to **Table 3**)and the severity (refer to **Table 4**) of a crash or collision between a pedestrian and an approaching vehicle.

TABLE 3: HOW OFTEN IS THE PROBLEM LIKELY TO LEAD TO A CRASH

Frequency	Likelihood Over Design Life	Austroads Description
Almost Certain	100%	Occurrence once per Quarter
Likely	45%	Occurrence once per quarter to once per year
Possible	20%	Occurrence once every three years
Unlikely	10%	Occurrence once every three years to once every five years
Rare	2%	Occurrence less than once every seven years.

TABLE 4: LEVEL OF RISK RESULT TABLE

Severity / Likelihood	Insignificant	Minor Injury	Moderate Injury	Serious Injury	Fatal
Almost Certain	Medium	High	High	**Extreme**	**Extreme**
Likely	Medium	Medium	High	**Extreme**	**Extreme**
Possible	Low	Medium	High	High	**Extreme**
Unlikely	Negligible	Low	Medium	High	**Extreme**
Rare	Negligible	Negligible	Low	Medium	High

Safe System crash outcome threshold

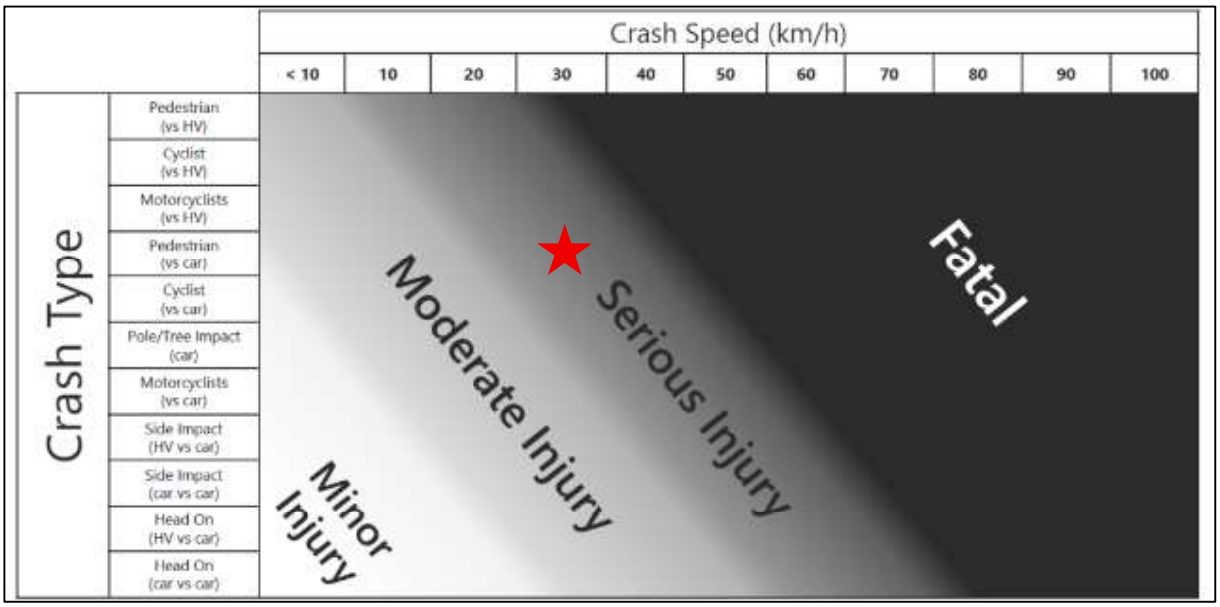

FIGURE 2: SEVERITY GUIDANCE SHEET – AUSTROADS

A vehicle would likely decelerate in anticipation of a pedestrian strike. It is reasonable to assume that at the point of impact, a vehicle would be traveling approximately 30km/h. As shown, in **Figure 3** an incident involving a pedestrian and a car at speeds between 30km/h can cause serious injuries. Although the incident may be rare, serious injuries indicate a **medium** risk level and exceeds the Safe System crash outcome threshold. Safety conscious planning is the term generally applied in the minds of accredited road safety auditors who are listed on the following website https://www.roadsafetyregister.com.au.

Implementation of a pedestrian refuge is the logical first step in assisting pedestrians crossing busy streets as it reduces the distance a pedestrian needs to find a gap in approaching vehicle streams, but also enables a staged crossing to occur increasing maximum peak hour volume thresholds. However, a refuge at this location would not physically fit without removing parking and the kerb extensions. Other measures such as zebra crossings or signals would not be appropriate given the impact to traffic flow efficiency and the minor roads do not exhibit large traffic volumes to require a signalised intersection. Any design solution to improve pedestrian safety will require input from the Roads Authorities, which is understood to be both Mosman Council and North Sydney Council.

To summarise, there is a risk of serious injury for pedestrians crossing Spofforth Street in an unsafe gap situation (as is evident in this location).

A review of the 5 Year TfNSW Crash Map indicating the following existing crashes at the intersection of Holt Avenue / Spofforth Street:

- 2021 – Serious Injury - Rum Code 10 (cross traffic);
- 2023 - Serious Injury - Rum Code 10 (cross traffic);
- 2021 – Non-casualty towaway, Rum Code 71 (left off carriageway into object / parked vehicle).

In addition to the above, a list of crashes at the intersection of Holt Avenue / Spofforth Street intersection has been provided by the client which is provided in **Annexure C** for reference which indicates that the intersection of Holt Avenue / Spofforth Street has a large crash history having, seven (7) crashes in 2018, ten (10) in 2019, one (1) in 2021, three (3) in 2022, three (3) in 2024 and two (2) in 2025.

5 Summary

The site's walking distance assessment relies on a pedestrian route that crosses Spofforth Street at the intersection with Holt Avenue. Traffic conditions and geometric constraints make this crossing location unsafe for pedestrians, particularly during peak hour periods of traffic flow. As a result, the site is not within a safe 800m walking distance as defined in the SEPP Housing 2021, as the definition of walking distance requires a route that can be safely walked.

- Pedestrian delays to cross Spofforth Street become excessive when two-way traffic volumes exceed 981 vehicles per hour during peak hour periods;
- Both the traffic volumes in the AM and PM peaks, 1,012vph and 1,086ph respectively, exceed the threshold at which pedestrian crossing delays become excessive and unsafe.
- The delay experienced by pedestrians crossing is 40.1 seconds and 46.7 seconds in the AM and PM peak hour respectively which exceeds the threshold of 30 seconds.
- The exceedance of thresholds means that pedestrians will either cross during an unsafe gap in approaching traffic (reflecting a high-risk exposure level) or reroute their path to add a further 170m walking distance.
- There is a risk of serious injury for pedestrians crossing Spofforth Street during an unsafe gap in approaching traffic.
- Both outcomes undermine compliance with the SEPP definition of "walking distance", as the route is either unsafe or the alternative route exceeds 800m via the signalised intersection of Military Road / Spofforth Street.

Please contact the undersigned on 9521 7199 should you require further information or assistance. The undersigned's CV is provided in **Annexure D** for reference.

Yours faithfully,

McLaren Traffic Engineering
Matthew McCarthy
Associate
BE Civil Engineering
Masters of Engineering Science
RMS Accredited Level 3 Road Safety Auditor
RMS Accredited Work Zone Traffic Management Plan Designer and Inspector

Quality Checked by
Craig McLaren
FIEAust CPEng NER
RPEQ 19457
APEC Engineer IntPE(Aus)
Director & Mentor
BE Civil, Grad Dip (Transport Engineering), MITE, FIEAust
RMS Accredited Level 3 Road Safety Auditor [1998]
SafeWork NSW Traffic Control Work Training card
[Authorisation #TCT0015914: Prepare Work Zone (PWZ)]
Expert Traffic Engineering & Road Safety Witness
NSW Land & Environment & NSW Supreme Courts

ANNEXURE A: WALKING ROUTES
(1 SHEET)

LEGEND

EXISTING PRAM CROSSING	
WALKING ROUTE 1	
WALKING ROUTE 2	
DEVELOPMENT SITE	
TOWN SHOPS	

LENGTH
WALKING ROUTE 1 : 742m
WALKING ROUTE 2 : 668m

BEFORE YOU DIG www.byda.com.au Zero Damage - Zero Harm

GDA2020

0 15 30 45 60 75
SCALE 1:750 @ A1

Revision	Date	Description	Reference
H	00/00/00	–	00
G	00/00/00	–	00
F	00/00/00	–	00
E	00/00/00	–	00
D	00/00/00	–	00
C	00/00/00	–	001
B	00/00/00	–	001
A	00/00/00	–	001

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THIS IS THE PLAN REFERRED TO IN MY LETTER DATED: 17/11/2025
Registered Surveyor Date

Client: GRAND NOBLE PROJECT 1 PTY LTD
Drawing title: PLAN SHOWING WALKING DISTANCE TO TOWN CENTRE FROM LOTS1 & 2 IN DP 748842 AND LOTS 37, 38, 39 & 41 & 42 SEC A DP 2509 KNOWN AS NO.11-23 RANGERS AVENUE, MOSMAN

datum: AHD
site area: 3594m²
LGA: MOSMAN

reference number: 52571 001WD
scale: 1:750 @A1
date of survey: 17/11/2025
SHEET 1 OF 1

ANNEXURE B: TRAFFIC SURVEY RESULTS

(1 SHEET)

TRANS TRAFFIC SURVEY

trafficsurvey.com.au

TURNING MOVEMENT SURVEY

Intersection of Holt Ave and Spofforth St, Mosman

GPS -33.830843, 151.229780

Date:	Thu 04/12/25
Weather:	Fine
Suburban:	Mosman
Customer:	McLaren

North:	Spofforth St
East:	Holt Ave
South:	Spofforth St
West:	Holt Ave

Survey Period	AM:	6:30 AM-9:30 AM
	PM:	2:30 PM-6:30 PM
Traffic Peak	AM:	8:15 AM-9:15 AM
	PM:	3:00 PM-4:00 PM

All Vehicles

Time		North Approach Spofforth St				East Approach Holt Ave				South Approach Spofforth St				West Approach Holt Ave				Hourly Total	
Period Start	Period End	U	R	SB	L	U	R	WB	L	U	R	NB	L	U	R	EB	L	Hour	Peak
6:30	6:45	0	2	63	4	0	1	16	1	0	4	53	14	0	0	0	0	786	
6:45	7:00	0	2	85	4	0	2	14	8	0	5	64	14	0	0	0	1	868	
7:00	7:15	0	2	70	2	0	1	9	8	0	5	72	25	0	1	0	2	928	
7:15	7:30	0	3	88	6	0	2	17	8	0	4	82	20	0	2	0	0	1004	
7:30	7:45	0	2	93	4	0	4	18	11	0	3	88	16	0	0	1	0	1055	
7:45	8:00	0	4	103	11	0	5	17	9	0	5	86	15	0	1	0	3	1113	
8:00	8:15	0	5	76	9	0	2	14	15	0	9	121	21	0	0	0	1	1113	
8:15	8:30	0	6	93	2	0	4	15	13	0	9	114	18	0	1	2	6	1126	Peak
8:30	8:45	0	4	102	4	0	2	10	16	0	10	130	16	0	0	1	3	1099	
8:45	9:00	0	0	99	4	0	2	14	15	1	5	101	14	0	1	1	2		
9:00	9:15	0	2	105	8	0	6	13	6	0	11	103	29	0	0	0	3		
9:15	9:30	0	3	104	4	0	7	18	9	0	6	91	13	0	0	0	1		
14:30	14:45	0	6	89	5	0	6	16	10	0	5	111	7	0	1	0	2	1197	
14:45	15:00	0	3	105	4	0	3	34	13	0	7	101	15	0	0	0	1	1285	
15:00	15:15	0	17	114	7	0	2	34	14	0	6	97	21	0	0	1	5	1306	Peak
15:15	15:30	0	7	122	3	0	7	26	11	0	13	126	14	0	0	1	5	1293	
15:30	15:45	0	10	134	4	0	1	36	9	0	4	120	25	0	1	0	2	1278	
15:45	16:00	0	4	98	3	0	6	36	19	0	5	114	17	0	2	1	2	1189	
16:00	16:15	0	7	114	2	0	6	36	13	0	6	109	9	0	0	0	3	1183	
16:15	16:30	0	13	116	3	0	5	35	13	0	3	113	16	0	0	0	3	1197	
16:30	16:45	0	3	104	4	0	3	18	8	0	4	101	8	0	2	0	2	1213	
16:45	17:00	0	8	110	4	0	1	17	16	0	13	110	21	0	1	0	0	1257	
17:00	17:15	0	4	105	4	0	4	19	8	0	10	131	28	0	3	1	2	1237	
17:15	17:30	0	5	134	5	0	3	20	7	0	8	134	15	0	0	0	5	1207	
17:30	17:45	0	8	112	5	0	2	23	7	0	3	106	29	0	0	1	5	1125	
17:45	18:00	0	7	104	7	0	2	13	4	0	8	109	22	0	2	0	3		
18:00	18:15	0	6	111	12	0	1	17	7	0	12	101	16	0	1	3	2		
18:15	18:30	0	6	96	8	0	3	15	8	0	3	99	14	0	1	0	1		

ANNEXURE C: CRASH DATA FROM RESIDENTS
(8 SHEETS)

SPOFFORTH STREET CRASHES

as reported by residents since MARCH 2018

The intersection of Holt Avenue & Spofforth street is a location with frequent vehicle accidents. This is a record of **accidents witnessed and reported by residents to Harrison Precinct** but there may be many more which were not observed particularly during weekdays.

2018		
March 17, 2018 1pm	2 car crash	Ambulance, police, tow trucks
June 12, 2018 9pm	2 car crash	Car and van
June 24, 2018 2pm	2 car crash	Tow truck in attendance
July 2, 2018 4:40pm	2 car crash	
September 13, 2018 3:45pm	2 car crash	
September 14, 2018 4pm	2 car crash	
December 3, 2018 3pm	2 car crash	Car attempting right turn into Holt eastbound. Panel damage - no polic
2019		
February 2, 2019 8:50pm	2 car crash	
May 6, 2019 2pm	2 car crash	Head on collision 
May 8, 2019 4pm	2 car crash	No police involved.
May 11, 2019 4pm	2 car crash	Car was attempting to traverse across Spofforth from Holt when it was hit by a vehicle heading northbound on Spofforth.
July 11, 2019 10am	2 car crash	Car was attempting to traverse Spofforth from Holt Ave. Tow away.

SPOFFORTH STREET CRASHES

as reported by residents since MARCH 2018

		
October 5, 2019 7:30am	2 car crash	Corner of Holt Ave and Spofforth St. 
October 17, 2019 12pm	2 car crash	Subaru Foster and white Barina – ambulance arrived. No photo.
October 18, 2019 1:30pm	2 car crash	T-bone accident on Spofforth – vehicle traversing from Holt Ave.
October 19, 2019 5:30pm	2 car crash	Corner of Holt and Spofforth – Police and Fire brigade. 
October 24, 2019	Cyclist + car	Cyclist traveling inside of stationary traffic south on Spofforth clipped by taxi turning right onto Spofforth from Holt
November 15, 2019	2 car crash	T-bone accident. No photo.
November 16, 2019	2 car crash	T-bone accident.

SPOFFORTH STREET CRASHES

as reported by residents since MARCH 2018

3 :45pm		
2020		
January 23, 2020	Single car	Taxi with flat tyres - caused by hitting “silent cop” (now removed) at center of Holt Ave. 
February 27, 2020	Single car	Accident corner of Cabramatta Road & Spofforth - vehicle lost control, mounted footpath, hit a pole and tree at the corner of Cabramatta Road. 

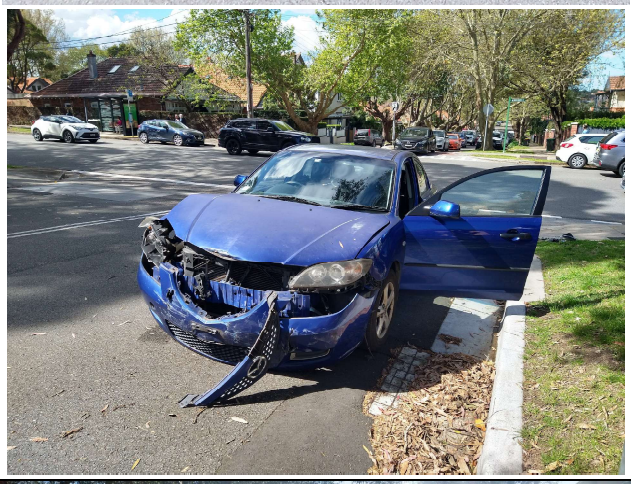
SPOFFORTH STREET CRASHES

as reported by residents since MARCH 2018

2021		
January 15, 2021	Motorcycle and car	T-bone crash Spofforth and Holt Ave. Ambulance, police in attendance. 
January 22, 2021	Single car	Car crash on Holt Ave - outside 140 Holt Ave Residents reported vehicle being driven at high speed northbound towards Military Road Car extensively damaged.
2022		
July 24, 2022	2 car crash	T-bone crash. Extensive damage to both vehicles. 

SPOFFORTH STREET CRASHES

as reported by residents since MARCH 2018

September 10, 2022 1:30pm	3 car crash	 
October 3, 2022 2:33pm	2 car crash	

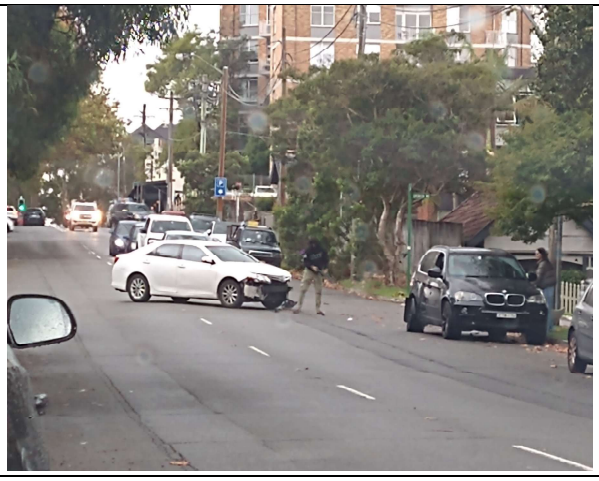
SPOFFORTH STREET CRASHES

as reported by residents since MARCH 2018

		
2023		
November 28, 2023 10:57	2 car crash	**Reported by Cathy to to mayor, r.bendall, p.friedrich, s.hughes, s.menzies, l.moline, m.randall** **Police and ambulance in attendance.**
2024		
February 6, 2024 9am	3 car crash	Holt ave intersection of Spofforth. Victim stated she was hit whilst turning right out of Holt on the Mosman side - the car was seriously damaged. Police in attendance. 

SPOFFORTH STREET CRASHES

as reported by residents since MARCH 2018

May 24, 2024	2 car crash	
September 2, 2024 9am	2 car crash	Resident reported: I just heard on the ABC traffic report about a big crash this morning causing traffic delays on Military Rd. I didn't see/hear anything although when I went outside to put my garbage out at 9am I saw a tow truck with a smashed up black BMW 4-wheel drive on it.
November 9, 2024 4:30pm		Serious accident at the intersection of Holt Ave and Spofforth St. Ambulance, Fire Brigade and Police were in attendance.  

SPOFFORTH STREET CRASHES

as reported by residents since MARCH 2018

2025		
October 27, 2025 9:45pm	3 car crash	T-bone collision. Main damage was to a late model sports Mercedes which was undriveable due to damage to the front and passenger side. No police were in attendance and no one was physically injured.
November 19, 2025 Approximately 8am	2 car crash	Intersection of Holt Avenue and Spofforth St. 

ANNEXURE D: MATTHEW MCCARTHY CV
(1 SHEET)

Matthew McCarthy (Associate)

Experienced consulting traffic engineer within the private sector for the preparation and review of traffic impact assessments for a wide range of land uses and scales. Skilled in traffic modelling and analysis, preparation of road safety audits, traffic and transport planning, provision of detailed design advice for small and large scale developments. Regular appearances as an expert witness in the NSW Land and Environment Court to provide evidence on matters related to traffic, parking and road safety aspects of development.

Qualifications

Bachelor of Civil Engineering,
University of New South Wales Australia
2013

Masters of Engineering Science (Civil)
Majoring in Transport Engineering
University of New South Wales Australia
2015

RMS Accredited level 3 Road Safety Auditor (RSA-02-1197)
RMS Accredited Work Zone Traffic Management Plan Designer

Experience

MCLAREN TRAFFIC ENGINEERING
2016 to date

- Construction Traffic Management Plans
- Concept Parking Designs
- Roundabout Intersection Concept Designs
- SIDRA Intersection Traffic Modelling
- Invarian Rapid Plan
- Expert Advice at Public Meetings
- Preparation of Conditions of Consent
- Preparation & Review of Traffic Impact Assessment
- Expert Witness
- Road Safety Audits
- Signalised Intersection concept designs
- Unsignalised Intersection Concept Designs
- Detailed Design Advice for a varity of Land Uses
- Staff Training
- Preparation of Statement of Facts and Contentions relevant to traffic
- Reviewing and approval of documents and Plan
- Peer Reviews