

17 December 2025

Ritu Shankar

Department of Planning, Housing and Infrastructure

via Major Projects Portal

**Project Name: Rangers Avenue Residential Development with Affordable Housing**

**Case ID: SSD-96272465**

**Submission from 22 Holt Avenue, Mosman (immediately north of subject site)**

We are writing to you in response to the public notification of the above State Significant Development Application (**SSDA**).

Whilst the Environmental Impact Statement (**EIS**) may ostensibly meet minimum form and content requirements and address each of the SEARs, it is clear that it has been prepared in a one-sided and selective manner which fails to address (or adequately address) many substantive issues relating to the proposed development. Certain aspects have been approached in a procedural, compliance-driven manner as opposed to presenting evidence-based findings, and this risks misleading the Department of Planning, Housing and Infrastructure (**DPHI**) and the local community. Further, community engagement activities and consultation undertaken by Urbis have been disingenuous and opaque.

Our key observations and concerns in respect of the EIS are outlined below in this response.

## **1. Overview of key issues**

- 1.1 Critically, none of the lots comprising the subject site are within the 'low and mid rise housing area' (**LMR Area**), as defined in the State Environmental Planning Policy (Housing) 2021 (**Housing SEPP**). The applicant's proposed walking routes to the Cremorne Town Centre do not meet the definition of 'walking distance' in the Housing SEPP. This position is supported by a letter of advice from McClaren Traffic Engineering, one of Australia's leading traffic experts and RMS Accredited Level 3

Road Safety Auditor, dated 16 December 2025, (**refer to Annexure A**), and a Survey Report dated 4 December 2025 prepared by Survplan dated 4 December 2025 (**refer to Annexure B**). As such, the development standards applicable to the 'low and mid rise housing outer area' (**LMR Outer Area**) in Chapter 6 of the Housing SEPP do not apply to this development, and it should be rejected on this basis.

1.2 Even if it were to be accepted that the subject site is within the LMR Area (which would result from an interpretation which misapplies the provisions of the Housing SEPP and is therefore legally unsound), it is clear that the location and dimensions of the subject site are not suitable for a development of this nature, and the built form and scale is not in any way compatible with, or sympathetic to the existing low-density and heritage context of the surrounding area. These issues have been superficially addressed in the EIS. In our view, the development would have a significant visual impact, particularly from the adjoining C4 Environmental Living zone and Holt Estate Heritage Conservation Area (**Holt HCA**), and would be highly detrimental to existing environmental amenity and heritage character. The impacts and practicalities of large-scale excavation on the subject site have also not been adequately assessed, and present material risks of damage and disruption to neighbouring properties and local infrastructure over an extended period. These positions are supported by submissions prepared on our behalf by Northern Development Assessment, a town planning and development consultant (**refer to Annexure C**) and GBA Heritage, a pre-eminent Sydney-based heritage consultant (**refer to Annexure D**).

1.3 At a personal level, the current use and enjoyment of our home would be dramatically altered by the proposed development. Our home is directly behind the proposed development's eastern stack, which has the smallest rear setback and contains the northern-oriented affordable housing apartments. Like many others on Holt Avenue, our home has been designed on a north-south axis with living areas located towards the rear and enjoying a southerly aspect, views, sunlight and breeze. Our young children regularly play in our backyard and on our rear balcony. If the development were to proceed based on the current design, we expect to lose all views of the sky from our kitchen, living room and dining room (from a standing or sitting position). Our privacy, including that of our young children, would also be completely breached, with habitable rooms and balconies of the proposed development directly overlooking our backyard and the main living areas of our home.

1.4 Finally, we note that the NSW SSD policy is designed to fast track truly state-significant projects and accelerate housing supply in appropriate contexts, including *high-yield* apartment developments. The SSD policy should not be used to promote luxury, water view, apartment blocks which technically meet a development cost threshold (because of the high-end nature of the build and awkward site location and geometry) but which are not justified by any overwhelming public benefit or social impact. This is particularly the case where it is apparent the site has been strategically chosen, and the building designed with a vertical distribution of floorspace, with the aim of securing high-value harbour and CBD views and maximising developer profits. The SSDA should be assessed with a sharp focus on the policy intent, to ensure the integrity of the SSD regime is not undermined.

1.5 The above issues are addressed in further detail below, by reference to the matters for consideration by the consent authority outlined in section 4.15 of the *Environmental Planning and Assessment Act 1979* (NSW) (**EPA Act**).

**2. The subject site is not within the LMR Area as defined in the Housing SEPP (relevant to subsection 4.15(a)(i) of the EPA Act)**

2.1 Under the Housing SEPP, a site is considered within the LMR Outer Area if it meets the definition under section 163:

*land between 400m and 800m walking distance of—*

*(i) land identified as “Town Centre” on the Town Centres Map, or*

*(ii) a public entrance to a railway, metro or light rail station listed in Schedule 11, or*

*(iii) for a light rail station listed in Schedule 11 with no public entrance—a platform of the light rail station, and*

*(b) if part of a lot is on land identified in paragraph (a)—the lot, unless the lot is also in the low and mid rise housing inner area.*

2.2 Schedule 10 of the Housing SEPP defines “walking distance” as:

*“the shortest distance between 2 points measured along a route that may be safely walked by a pedestrian using, as far as reasonably practicable, public*

*footpaths and pedestrian crossings*".

- 2.3 The above definition incorporates a composite requirement that imposes a positive obligation to assess whether the route not only can be safely walked, but whether it reasonably utilises available pedestrian crossings. Applying principles of statutory interpretation, including the need to give effect to all words in a provision, it is essential that the phrase "so far as reasonably practicable using footpaths and pedestrian crossings" is not treated as surplus. The above interpretation is consistent with the policy intent of promoting walkable, connected urban areas in a manner which balances practicality and safety.
- 2.4 The applicant has provided 2 walking routes to evidence that all lots comprising the subject site are within 800m walking distance of the Cremorne Town Centre. JMT Consulting have prepared the Transport Impact Assessment (**TIA**) (EIS Appendix BB) which addresses the walking distance assessment. The TIA states that "the walking routes have the ability to be safely walked by a pedestrian and the walking routes utilise, as far as practicably possible, public footpaths and pedestrian crossings" (page 17). However, this statement has not been substantiated to any extent. The TIA goes on to assess the safety of walking sections of Bloxsome Lane and Bardwell Lane, but is silent on the safety of crossing Spofforth Street. This omission may be considered intentional because it is apparent to an ordinary person (let alone a traffic engineer) that the dangers of crossing a busy, arterial road with multiple T-intersections such as Spofforth Street are likely to outweigh those of walking a suburban back lane, and should therefore be addressed in any walking distance assessment. It is also pertinent to note that the kerb ramps at the intersection of Spofforth Street and Holt Avenue are not "pedestrian crossings" as that term is ordinarily understood and having regard to Austroads guidance and the NSW road rules.
- 2.5 Further, the confirmation in the Surveyor Walking Map prepared by LTS Surveyors that "the route crosses residential streets with adequate pedestrian safety" should be disregarded. A registered surveyor is not qualified to provide a pedestrian safety assessment, which will turn on traffic volumes together with other considerations such as road geometry, alignment and accident history. Further, and as above, the statement by LTS Surveyors has not been substantiated to any extent.

- 2.6 The two walking routes advanced by the applicant do not meet the statutory definition for the following reasons:
- 2.6.1 The routes cannot be safely walked, given crossing Spofforth at Holt Avenue (or at any point between Rangers Avenue and Military Road) presents a material risk to pedestrian safety. Please refer to letter of advice from McLaren Traffic Engineering (**refer to Annexure A**) which outlines these risks. McLaren Traffic Engineers are one of Australia's leading traffic experts - Craig McLaren and Senior Project Traffic Engineers have been involved in over three hundred and fifty Land and Environment / Supreme / High Court proceedings. The author of the advice is also an RMS Accredited Level 3 Road Safety Auditor. In summary, the bi-directional traffic volumes in both the AM and PM peaks exceed 1000 vehicles per hour, meaning there is a risk of serious injury for pedestrians crossing Spofforth Street in an unsafe gap; and
  - 2.6.2 The routes do not make use of the nearby pedestrian crossings at the intersection of Spofforth Street and Military Road (signalised crossing) or at the intersection of Spofforth Street and Rangers Avenue (zebra crossing).
- 2.7 We have engaged Survplan Pty Ltd to measure the distance of 5 alternative routes that can be safely walked, making use of the abovementioned pedestrian crossings, from each of the lots comprising the subject site to the Cremorne Town Centre (**refer to Annexure B**). All routes comfortably exceed 800m walking distance. These routes unquestionably present safe, reasonable alternatives to the routes advanced by the applicant. In arriving at this conclusion, it is important to note that these routes result in only a very modest additional distance to be walked and no material change in gradient (i.e. there is no undue detour required). Further, a route using the signalised pedestrian crossing at Military Road also provides direct access to bus transport and the Cremorne retail precinct, which is consistent with the LMR policy intent, with this modest additional distance likely to be walked by a pedestrian accessing the town centre in any event.

**3. Impact of the proposed development to the low-density and heritage context of the surrounding area (relevant to subsections 4.15(a) – 4.15(c) of the EPA Act).**

3.1 The various impacts of the proposed development are outlined in further detail below. It is important to note at the outset that during consultation, questions were raised by Holt Avenue residents as to whether similar outcome in terms of GFA / number of apartments could be achieved via alternative designs and / or a greater focus on horizontal distribution of floor space which would ameliorate the effects of the development on neighbouring properties. However, the Urbis / Eterno representatives confirmed these alternatives had not and would not be considered, and the architect noted that “you can’t keep everyone happy”. It was further noted by Eterno that a development that was less than 6-storeys would not be economic. However, developer profitability should not dictate planning outcomes, particularly where these outcomes would come with huge costs to the local community.

3.2 It is relevant that under both the LMR and in-fill affordable housing provisions of the Housing SEPP, the LMR development standards and in-fill affordable housing bonuses should not be treated as an entitlement, and nothing mandates that the consent authority must approve a development application.

3.3 In advice provided by DHPI on 24 February 2025 in respect of the LMR reforms, the Deputy Secretary of Planning, Land Use Strategy, Housing and Infrastructure stated:

*“Nothing in these reforms mandates a Council [as the relevant consent authority in that case] must approve a DA. The Council LEP...still apply for all issues beyond non-discretionary standards. Clause 5.10 of the LEP relating to Heritage Conservation still continues to apply, is not overridden by the policy, and must be considered....Projects will not be automatically be approved. Council must still conduct a merit-based assessment. Nothing stops Council from assessing matters such as heritage significance as well as matters like...front and side setbacks,....streetscape character,.....and the bulk and scale of buildings. These are all matters that would be part of a merit assessment and if the impact of the new development was unacceptable, Council can refuse the DA...”*

3.4 Further, the In-fill affordable housing practice note released by the DPHI in December 2023, notes the following:

*“The in-fill affordable housing bonuses should not be treated as an entitlement. DAs that propose in-fill affordable housing will be subject to merit assessment by the consent authority. The application of the bonuses does not affect a consent authority’s responsibility to consider the requirements of relevant EPIs, a development’s likely impacts or the suitability of the site for the development. In applying the in-fill affordable housing bonuses, applicants and consent authorities should be flexible in the design response of the development having regard to:*

- *the Government’s policy intent to deliver more affordable housing through the in-fill affordable housing provisions of the Housing SEPP, and*
- *the impact of the development on the amenity of the site and adjoining land, taking into account the building’s height, scale and bulk.”*

#### *Zone transition and interface*

- 3.5 C4 Environmental Living zones were intentionally excluded from the LMR policy to protect areas of high ecological and scenic value, such as ridgelines, foreshore edges, and bushland. This exclusion reflects a deliberate planning approach to maintain landscape integrity and scenic amenity in sensitive locations (including certain parts of Mosman).
- 3.6 Where R3 Medium Density zones adjoin C4 land, a careful transition in built form is essential. Development should respect the scale and character of the environmental zone, as reinforced by State and local urban design principles. However, the EIS offers only a generic statement that the design “sits comfortably within its setting” without providing any substantive justification.
- 3.7 In reality, the proposal does not achieve a meaningful transition. It maximises - and exceeds - permitted height and scale under the LMR policy, disregarding the adjoining C4 zone. Architectural plans show uniform setbacks from ground level to Level 5, with only a minor adjustment at Level 6. This creates a tall, continuous facade that will dominate the Holt Avenue interface, lacking any stepping or modulation to soften the impact.
- 3.8 The narrow Bloxsome Lane to the rear of the subject site does little to mitigate this outcome. Given the building’s height and mass, the development will present as

visually imposing from Holt Avenue properties and private open spaces, resulting in an abrupt and unresolved interface between large-scale apartments and a permanently low-density residential environment.

### *Visual impact*

- 3.9 The SEARs issued by the DPHI require the applicant to provide visual analysis from key viewpoints, including photomontages, and a visual impact assessment where impacts exceed planning expectations. Despite this, the Visual Impact Assessment (Appendix CC) (**VIA**) omits any analysis from the north of the subject site - arguably the most affected viewpoint - where neighbouring homes will experience the greatest impact. No photomontages or perspectives from this direction were included, meaning this particular requirement has not been met and visual impact cannot be properly assessed. During the consultation process, repeated requests were made by architectural rendering and information on the visual impact from the north throughout, with these requests ignored by Urbis.
- 3.10 Indicative architectural modelling undertaken independently by Holt Avenue residents indicates that the visual impact from the north of the subject site will be significant, and potentially compounded by the unattractive rear facade dominated by service elements, unlike the harbour-facing frontage.
- 3.11 Further, the VIA notes that the *“proposal is an early LMR development within this visual context, it will be visible in isolation and significantly differ in scale to immediately adjacent low density development. The difference in scale will be experienced in the short term, until such time as subsequent LMR developments are constructed and visual effects are reduced”* (page 40). However, the applicant’s claim that scale differences will diminish as LMR development occurs is erroneous. *All land immediately to the north, east, and south* of the subject site is either outside the LMR Area or zoned C4 Environmental Living (which is excluded from the LMR policy). Further, as depicted in the EIS (page 25), the existing high-rise forms in the area are barely visible from the subject site due to topography. For example, only the upper most floor of the existing 7-storey apartment building at 36A Park Avenue (immediately to the south of the subject site) is visible from Rangers Avenue, with the building barely noticeable given it is harmonised with the existing cliff face topography (Figure 01 below). The proposed development will therefore remain *permanently out of scale with its surroundings, creating a lasting and discordant visual impact.*



Figure 01 – image of 36A Park Avenue (7-storeys) and the cliff face immediately to the south of the subject site, which emphasises that the development permanently visible in isolation and larger in scale than its surrounds.

- 3.12 In our view, the VIA also downplays the visual impact from various photomontage locations to the south of the subject site, all of which sit within the “Scenic Protection Area” under the Mosman Local Environmental Plan 2012. For the reasons provided above, the proposed development will present as visually imposing from these sites given the permanently low density surrounds. Viewpoint 06 in the VIA (page 36), for example, which depicts the line of sight from Mosman Bay illustrates the huge visual presence the proposed development will have from Sydney Harbour.

#### *Heritage impact*

- 3.13 In our view, the Heritage Impact Statement (Appendix Z) (**HIS**) significantly understates the heritage value of the Holt HCA. While it cites the Mosman Residential Development Control Plan 2012 to claim that “its significance has been diminished by modifications which have catered to the requirements of individual owners’ amenity at the cost of respecting and retaining heritage values” (page 35), this is a selective reading. The DCP explicitly acknowledges that many original features remain key elements of Mosman’s heritage character and are integral to the municipality’s identity.
- 3.14 Further, the Holt Estate Ranking Map published by Mosman Council confirms that the majority of properties along Holt Avenue and Spencer Road are classified as “contributory”, not “neutral” or “detracting”

([RankingMap\\_C3\\_2017\\_Current\\_Layout](#)). These homes collectively reinforce the historic streetscape and architectural coherence of the Holt HCA, despite some alterations over time.

- 3.15 The HIS also asserts that “impacts of the proposed development on the HCA are mitigated through architectural design, which follows the existing topography of the area” (page 51). This claim is incorrect. There is no topographical alignment, with the applicant noting that the height exceedance request is required due to the topography of the site and the design of the building does not address the fundamental issue of scale, bulk, and visual dominance, which remain incompatible with the Holt HCA’s established character.
- 3.16 Critically, the HIS omits Heritage Item I380, being the Holt Avenue street trees extending along the road reserve for the full length of Holt Avenue between Cowles Road and Spofforth Street. According to the NSW State Heritage Inventory, these trees form “one of Mosman’s finest avenues of street trees,” distinguished by their alternating evergreen and deciduous planting, which allows winter sunlight penetration. They are formally assessed as both “scientifically rare” and “aesthetically rare” regionally within the heritage context, underscoring their exceptional contribution to the streetscape and the conservation area’s significance ([HMS - ViewItem](#)). The proposed development would become a permanent backdrop to Holt HCA and Heritage Item I380, and would arguably compromise their visual prominence and directly erode a defining heritage feature.

*Privacy and amenity impacts arising from height and proximity*

- 3.17 Our property is directly positioned behind the eastern stack of the proposed development. This stack contains all of the 2-bedroom affordable housing units on the north side of the building. These units have their kitchen, living and dining rooms facing north, which flow out to their only balconies from there (refer to page 42 of Design Report Part 3 (Appendix M)). This is despite being explicitly advised during the consultation process that all kitchen, living and dining areas would be oriented to the south, such that northern balconies / terraces in the proposed development were unlikely to be used on a regular basis.
- 3.18 The rear setback of the proposed development between the dwellings on Holt Avenue is at its smallest at this point. The applicant has provided no consideration to the impact of these north facing living areas on the existing residents of Holt Avenue. There should be consideration as to whether these apartments could

instead be located in the western stack where there is significantly more space between the proposed building and the rear yards and internal living spaces of the Holt Avenue properties, relieving the privacy and amenity impacts.

- 3.19 Notwithstanding the above, the entirety of the northern facade includes windows and balconies / terraces that look directly into our backyard and living areas, and that of our near neighbours. The minimal modulation on the upper level also allows for a downward viewing angle into our homes. The extensive use of balconies, windows and habitable rooms along the northern side, particularly on the eastern end where the setback is smallest will result in a gross breach of our privacy that will not be reduced by the planting proposed due to the shallow soil depth of the site.
- 3.20 Further, as illustrated below (Figure 02) the close proximity and imposing nature of the proposed development will block all views of the sky from our kitchen, living room or dining room (from a standing or sitting position), and reduce sunlight and natural airflow through these areas. The development as currently proposed will form a continuous, unbroken mass from our living areas, and create the feeling of being entirely boxed in. For context, the homes on Rangers Avenue which are visible from this image are two storey dwellings with a height of less than 8.5m. The proposed development is almost three times that height, and is proposed to have a similar or smaller rear setback.



Figure 02 – 11 and 13 Rangers Avenue identified which are two storey homes with a height of <8.5m. The continuous built form and minimal rear seat back of the eastern stack of proposed development will completely block views of the sky from our home.

*Non-compliance with maximum building height development standard*

- 3.21 The impacts on Holt Avenue residents are further intensified by the proposed breach of the building height standard. The development reaches 25.59 metres at the south-eastern corner and 24.37 metres at other points, exceeding the permissible height by up to 2.84 metres (approximately 12.5%).
- 3.22 The applicant's justification for the Clause 6.4 variation - primarily the delivery of affordable housing and claims of limited local impact - does not demonstrate that strict compliance with the height control is either unreasonable or unnecessary in this context. These arguments fail to address the ongoing amenity, view, and character impacts at the Holt Avenue interface identified above. On this basis, the Clause 4.6 test is not met, and the proposed variation should not be supported.
- 3.23 We would further request that the FSR calculations and compliance with the in-fill affordable housing bonuses are also tested, including to understand whether a similar Clause 4.6 variation would be required.

*Excavation and impacts to neighbouring properties and local infrastructure*

- 3.24 The Geotechnical Investigation (Appendix S) (**Geotechnical Report**) acknowledges that substantial excavation will be required, extending through dense sandstone to depths of 8½ - 10 m, yet it does not prescribe or validate an excavation method upfront or assess its impacts on neighbouring properties, with an 'adapt to what is encountered' approach effectively suggested. Methods such as ripping and rock hammers are known to generate excessive vibration and noise. The report also defines a wide zone of influence - up to 16-20 m from the excavation - but offers no modelling of effects, no formal noise analysis, and only cursory vibration guidance. This omission leaves a significant risk of damage to adjoining structures and unacceptable disturbance to residents over an extended period. This is particularly the case because the basement car park will take up almost the entire area of the subject site, extending back to the edge of Bloxsome Lane (refer to page 25 Design Report Part 2 (Appendix M)) – this means the zone of influence will capture the homes on Holt Avenue in the adjoining Holt HCA. The risks associated with this issue must be thoroughly addressed during this stage of the approval process and not merely as a pre-condition of commencement (or continuation) of work.
- 3.25 While the Geotechnical Report notes that excavation faces must be engineered, defects stabilised, and seepage controlled, it does not present a comprehensive

stability or safety case for the site. The possible need for temporary or permanent anchors is flagged, including the requirement for adjoining owners' consent if anchors extend beyond the boundary, yet the design remains unsettled and reactive. There is no clear modelling of loads, movements, or anchor-group interactions, nor any assurance that stability will be maintained. These gaps create uncertainty about how overall site stability will be achieved during and after excavation.

- 3.26 Finally, the Geotechnical Report is silent on the logistics of removing large volumes of rock from the subject site. Rangers Avenue have a 3-tonne weight limit and was not designed for continuous heavy truck movements (of which there are likely to be thousands) to remove such a volume of rock. The excavation phase will inevitably exceed these limits, causing damage to local road surfaces and underground services and introducing serious traffic-safety hazards on Rangers Avenue which is a narrow and busy sub-arterial road flanked by narrow roundabouts which runs past a cliff face in one section and includes a tight S bend in another. Combined with the absence of noise and vibration analysis, the lack of planning for infrastructure impacts underscores the hugely disruptive nature of this development.

#### **4. Misalignment with SSD policy intent and other public interest considerations (relevant to subsection 4.15(b) and 4.15(e) of the EPA Act).**

##### *Misuse of SSD pathway*

- 4.1 As above, the SSD policy should not be used to facilitate and promote luxury, water view, apartment blocks which technically meet a development cost threshold (because of the high-end nature of the build and awkward site location and geometry which requires heavy excavation) but which are not high-yield nor justified by any overwhelming public benefit or social impact. Outside of the affordable housing component, these apartments will only be accessible to the very wealthy, and are likely to be purchased by local downsizers for prices reaching into the tens of millions. The developer has a track-record of building expensive luxury developments across Sydney (see [here](#), and [here](#) for an article about apartment prices in the Ode - note Eterno previously traded as "Top Spring").
- 4.2 This policy intent is evident from the SSD criteria for the NSW Housing Delivery Authority (HDA) pathway, with the estimated development cost threshold for SSD being over \$60 million in Greater Sydney, which is intended to construct 100+

homes, i.e. this criteria clear mandates a focus on *large-scale* residential development for a project to be considered through this pathway.

- 4.3 It is further noted that the developer has indicated through community consultation that ownership of the affordable housing apartments may not be retained by the developer, even during the 15-year period of management by a community housing provider. When questioned as to the price at which these apartments would be sold during consultation, and to whom they would be sold to, the response from the developer’s representative was simply that the purchasers would likely be people with “big super balances”.

#### *Social impact considerations*

- 4.4 The In-fill affordable housing practice note released by the DPHI in December 2023, notes the following:

*Residential amenity is one of the design quality principles under Chapter 4 of the Housing SEPP that must be considered in the assessment of residential apartment development. Good residential amenity combines appropriate room dimensions and shapes, access to sunlight, natural ventilation, outlook, visual and acoustic privacy, storage, indoor and outdoor space, efficient layouts and service areas, and ease of access for all age groups and degrees of mobility. It is important that amenity is maximised across a development, **and that affordable dwellings are not subject to a lower standard. For example, if 70% of dwellings across a development achieve the ADG criteria for solar access (minimum 2 hours to living areas), then a similar percentage of the affordable dwellings should meet that standard.***

- 4.5 Notwithstanding the above, the affordable housing apartments will have a separate residential lobby within the eastern stack, separate lift access, and potentially also reduced access to common facilities, which risks creating social segregation. Further, the affordable housing apartments:

- Have inferior solar access (EIS page 59);
  - All apartments: 75% achieve  $\geq 2$  hrs sunlight
  - Affordable apartments: 61.5% achieve  $\geq 2$  hrs sunlight
  - The above implies c.80% of non-affordable  $\geq 2$  hrs sunlight,

- Have been provided less car spaces (TIA page 16)
    - Affordable: 2-bed = 0.5
    - Non-affordable: 2-bed = 1; 3+ bed = 1.5,
  - Do not enjoy the same southerly aspect and views as the non-affordable apartments as they have been located in the north-eastern part of the development.
- 4.6 The Social Impact Assessment (Appendix Y) (**SIA**) appears to demonstrate structural compliance with NSW guidelines but lacks depth and transparency. Community engagement is referenced but not substantiated - there is no evidence of who participated and what feedback was received.
- 4.7 Further, assumptions about future residents and positive impacts are presented without supporting analysis. One example is the statement “*the inclusion of larger apartments supports families households to live in the area and contributes to the increase and diversity of the future residents.*” (SIS page 19). However, this disregards the prohibitive pricing that these apartments are likely to carry and the inability for the vast majority of families to access these apartments, as evidenced by sales data for comparable projects in Mosman and elsewhere (see above). As such, there remains an open question as to whether the proposed development will genuinely introduce a diversity of housing and if there will be any change to social baseline as it pertains to Mosman (particularly age/demographic profile).
- 4.8 Finally, the SIA overlooks several important considerations, such as the cumulative impacts of concurrent developments in the local area, and the impacts on social infrastructure. No modelling has been undertaken to assess the capacity that existing social infrastructure such as schools and outdoor spaces have to absorb additional population associated with an LMR development wave.