

Community Submission: SSD-96272465

Residential Development with In-fill Affordable Housing, 11-23 Rangers Avenue, Mosman

Submitted by: John Warburton

Address: 40 Rangers Avenue Mosman

Date: 17 December 2025

1. Introduction

I am a resident of Rangers Avenue and submit this objection to the above State Significant Development application.

This proposal by **Eterno Property Group** (Grand Noble Project 1 Pty Ltd) seeks to demolish **seven existing homes** on a 3,594 sqm amalgamated site to construct a **part 6, part 7 storey residential flat building comprising 44 apartments** (including 10 affordable housing units), with **91 car parking spaces** across 2.5 basement levels.

My concerns relate primarily to the adequacy of the applicant's **Transport Impact Assessment (TIA)** and **Social Impact Assessment** on the existing community, as required under the Secretary's Environmental Assessment Requirements (SEARs).

2. Transport Impact Assessment Deficiencies (SEARs Requirement 9)

The TIA prepared by JMT Consulting contains significant methodological flaws that undermine its conclusions.

2.1 Traffic Survey Timing Does Not Capture Actual Peak Periods

The TIA states that traffic counts were undertaken at the Rangers Avenue / Park Avenue intersection during:

- **AM Peak: 9:00am - 10:00am**
- **PM Peak: 3:30pm - 4:30pm**

Critical flaw: The AM survey period of 9:00-10:00am **completely misses the school drop-off peak**, which typically occurs between **8:00-9:00am**. This is precisely the period when Rangers Avenue experiences its highest weekday traffic volumes and parking pressure. The survey timing appears designed to capture commuter traffic patterns, not the actual peak conditions experienced by local residents.

There is significant congestion at the Rangers Ave / Spofforth Street intersection from school traffic to Redland School, and there should have been a traffic count there.

2.2 No Weekend Traffic Assessment

The TIA conducted **no traffic surveys on weekends**. This is a fundamental omission given the site's proximity to:

- **Mosman Village** (generating significant Saturday morning shopping traffic)
- **Balmoral Beach** (generating afternoon return traffic)
- **Taronga Zoo** (generating weekend visitor traffic through the area)

Rangers Avenue functions as a key local route for traffic returning from these destinations. The failure to assess weekend conditions means the TIA does not reflect the actual traffic environment experienced by residents.

2.3 Traffic Generation Estimate is Misleading

The TIA claims the development will generate only **3-4 additional vehicle trips** during peak hours, describing this as "negligible." This estimate:

- Is based on TfNSW rates of 0.19 trips/apartment (AM) and 0.15 trips/apartment (PM)
- **Subtracts** the assumed traffic generation of the 7 existing houses being demolished
- Results in an artificially low "net" figure

The actual traffic generation of 44 apartments would be approximately **8 trips in AM peak and 7 trips in PM peak** - double the figure presented. The existing houses, many of which may be under-utilised prior to sale, should not be assumed to generate equivalent traffic to occupied family homes.

2.4 No Cumulative Impact Assessment

The TIA acknowledges (Section 4.9) that "there may be other construction projects occurring at the same time" but provides **no assessment of cumulative operational traffic impacts** from other approved or proposed developments on Rangers Avenue, including:

- **42-52 Rangers Avenue / 21-31 Brierley Street** (~100 apartments proposed)
- **25-31 Rangers Avenue** (development site, ~2,655 sqm)
- **37-41 Rangers Avenue** (development site, ~3,188 sqm)

Even if a formal Cumulative Impact Assessment is no longer a mandatory requirement, the cumulative effects should not be ignored given Rangers Avenue functions as a major arterial road

2.5 Parking Demand in Local Context

While the TIA provides **91 parking spaces** (80 resident + 11 visitor), equating to approximately **1.82 spaces per dwelling**, I submit this still underestimates actual demand in this locality:

- **28 of the 34 market-rate apartments are 3-4 bedroom dwellings**, likely to attract families with 2+ vehicles

- Mosman has **high car ownership rates** due to limited public transport penetration into residential areas
- The TIA acknowledges (Section 3.4) that "public transport does not meet all the travel needs of these residents, especially for destinations not well-served by public transport"
- Vehicle types in this area are predominantly **larger SUVs** requiring greater parking space dimensions than the AS2890.1 minimum

I have attached photographs in the appendix showing:

- At capacity on street parking
- Rangers Avenue / Spofforth Street congestion morning school drop-offs
- Rangers Avenue / Spofforth Street congestion afternoon school pick ups

3. Social Impact Assessment Deficiencies (SEARs Requirement 18)

The applicant's Social Impact Assessment identifies "increased traffic" as a potential negative impact, stating:

*"Despite the positive impact that will result from the increased provision of affordable housing, there is also a risk of perceived negative impacts such as the loss of visual amenity, **increased traffic**, impacts on the existing community's sense of place and character of Mosman."*

However, the assessment conclusion then states:

*"The development will likely have a medium to high positive impact for both future residents and existing neighbours within the locality. However, there may be some **minor negative social impacts** experience by neighbours **in the short term**."*

3.1 Failure to Properly Assess Identified Impacts

The SIA **identifies traffic as a potential impact but fails to assess it** using the methodology required by the *Social Impact Assessment Guideline for State Significant Projects*. Specifically:

- No evaluation of the **likelihood** of traffic impacts occurring
- No evaluation of the **magnitude** of traffic impacts (extent, duration, intensity, sensitivity)
- No application of the **significance matrix** to determine impact rating
- No distinction between construction-phase and operational-phase traffic impacts
- The conclusion that negative impacts are "minor" and "short term" is **unsupported by any analysis**

3.2 Social Impact Categories Not Properly Addressed

Using the categories from the *Social Impact Assessment Guideline*, the following impacts have not been adequately assessed:

Way of Life

- How will increased traffic and parking competition affect residents' daily routines?
- The TIA's failure to survey during actual peak periods (school times, weekends) means this impact cannot be properly understood

Accessibility

- Reduced availability of on-street parking affects residents' ability to receive visitors, deliveries, and service providers
- No assessment of impacts on elderly or mobility-impaired residents who rely on close parking proximity

Surroundings

- The SIA acknowledges "loss of visual amenity" and impacts on "sense of place and character" but rates these as "minor" without justification
- Loss of seven Federation/Victorian-era homes (including 21 Rangers Ave, built c.1890) permanently alters the heritage streetscape

Community

- The SIA fails to assess how this development, combined with other proposed "super site" developments on Rangers Avenue, will cumulatively affect community composition and character

3.3 Corrected Significance Assessment

Applying the methodology in the *Social Impact Assessment Guideline Technical Supplement*, I submit the following assessment:

Impact	Likelihood	Magnitude	Significance
Increased traffic at peak times (weekends, school times)	Almost certain	Moderate	High
Overflow parking on local streets	Likely	Moderate	High
Loss of heritage streetscape character	Almost certain	Major	Very High
Cumulative community change (multiple developments)	Almost certain	Major	Very High
Reduced residential amenity	Likely	Moderate	High

The applicant's characterisation of these impacts as "minor" and "short term" is not supported by proper assessment methodology.

4. The Social Locality

The *Social Impact Assessment Guideline* requires the "social locality" to be defined as the area where people will experience impacts. For this development, the social locality extends beyond the immediate site to include:

- Rangers Avenue (full length) - traffic and parking impacts
- Bloxsome Lane - construction access, changed character
- Brierley Street - cumulative development impacts
- Routes to/from Mosman Village, Balmoral Beach, and Taronga Zoo

The SIA has not adequately defined or assessed impacts across this social locality.

5. Requested Conditions

If the Department is minded to approve this development, I request the following conditions to address the identified deficiencies:

Transport Conditions

1. **Revised traffic surveys** to be conducted during actual peak periods:
 - Weekday AM: 7:30am - 9:30am (capturing school drop-off)
 - Weekend: Saturday 9:00am - 12:00pm and Saturday/Sunday 3:00pm - 6:00pm
2. **Cumulative traffic assessment** considering all approved and proposed developments on Rangers Avenue
3. **Construction Traffic Management Plan** to include:
 - No heavy vehicle movements during school drop-off/pick-up (8:00-9:15am, 2:30-3:45pm on school days)
 - Restrictions on Saturday morning construction vehicle access
 - Community liaison officer and complaints hotline
4. **Resident parking scheme contribution** to fund parking management measures on Rangers Avenue

Social Impact Conditions

5. **Post-occupancy traffic monitoring** at 6 and 12 months, with adaptive management if impacts exceed predictions
6. **Community notification requirements** for construction works affecting parking or traffic

6. Conclusion

I respectfully submit that:

1. The **Transport Impact Assessment** contains fundamental methodological flaws - traffic surveys were not conducted during actual peak periods (school times, weekends) and no cumulative assessment has been undertaken
2. The **Social Impact Assessment** identifies traffic as a potential negative impact but then **fails to assess it** using the required methodology, resulting in an unsupported conclusion that impacts are "minor"
3. The scale of change proposed for Rangers Avenue - with this and other "super site" developments potentially delivering **200+ new dwellings** - requires proper cumulative impact assessment that has not been provided
4. Without the additional surveys, cumulative assessment, and appropriate conditions, the Department cannot be satisfied that transport and social impacts have been adequately assessed

I request that the Department require the applicant to address these deficiencies before determination, or impose conditions that adequately mitigate the identified impacts.

Appendix

- At capacity on street parking



- Rangers Avenue / Spofforth Street congestion morning school drop-offs



29/10/2025 8:17 am



29/10/2025 8:18 am





- Rangers Avenue / Spofforth Street congestion afternoon school pick ups

