

SUBMISSION

State Significant Development Application

SSD-96272465

11-23 Rangers Avenue, Mosman NSW 2088

1. SUBMITTER DETAILS

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2. INTRODUCTION

We write to object to the proposed State Significant Development at 11-23 Rangers Avenue, Mosman, which proposes the demolition of seven existing dwellings to construct a six-storey residential building comprising 44 apartments.

We support the creation of affordable housing and recognise the important role such developments can play in addressing housing needs in our community. However, support for affordable housing does not mean accepting development at any cost or scale.

Our home is very close to the proposed development and Rangers Avenue is our key access route to Mosman village and the nearby ferry wharf.

Our submission raises serious concerns regarding:

1. The significant traffic impacts that will result from this development; and
2. The inadequate building setbacks relative to the proposed six-storey height, which will negatively impact neighbouring properties and the established character of the area.

3. TRAFFIC AND PARKING CONCERNS

3.1 Road Network Capacity and Traffic Generation

Rangers Avenue is not designed to accommodate traffic volumes of this magnitude and cannot support traffic flows at peak times as the major connecting route from Neutral Bay/Cremorne to Mosman village for residents.

- **Narrow carriageway:** The street is a typical residential street with limited width, making it difficult for vehicles to pass.
- **Existing peak period congestion:** Rangers Avenue already experiences significant congestion at least twice every weekday during morning and

evening peaks, and every weekend when residents and visitors travel to nearby beaches and harbour foreshores.

The construction traffic management report by JMT Constructions did not include a review of the traffic flows at the connecting roundabout on Rangers Avenue and Avenue Road which experiences significant congestion. This is an oversight. The roundabout on Rangers Avenue and Park Avenue, the focus of the JMT Traffic Impact Assessment, does not experience the same volume of movements given that Park Avenue is a residential dead-end street. This assessment should be conducted again to comprehensively review construction and ongoing traffic impacts.

The JMT Construction Traffic Impact Assessment concludes that the new development will generate 4 additional vehicle movements in the AM peak and 3 vehicle movements in the PM peak. These calculations are based on the Transport for NSW Guide to Transport Impact Assessment (GTIA) 2024. In reviewing this reference guide it notes in its introduction that the guide may not be appropriate in all development situations and there is no rationale in the JMT report which justifies this standard measure being appropriate to 11-23 Rangers Avenue.

3.2 Parking Provision and Overflow

The proposed parking provision raises several concerns:

- **Visitor and service vehicle parking:** Inadequate provision for visitor parking (11 spaces for 44 dwellings) will force visitors to park on-street, exacerbating existing parking pressures
- **Multi-car households:** Many three and four-bedroom apartments will house families with multiple vehicles, and the parking provision may not adequately serve this demand
- **Impact on neighbours:** Overflow parking will displace existing residents who rely on on-street parking

3.3 Construction Traffic Impact

The construction phase will create additional significant traffic impacts:

- **Heavy vehicles:** Demolition and construction will require excavation equipment, concrete trucks, and materials deliveries unsuitable for the narrow street
- **Extended duration:** A development of this scale will require 18-24 months of construction traffic
- **Road damage:** Heavy construction vehicles will cause deterioration to road surfaces not designed for such loads
- **Safety hazards:** Construction vehicles reversing and manoeuvring pose safety risks in this residential environment

If this development is approved, the developers should be required to make financial contributions toward ameliorating the traffic issues on Rangers Avenue. This could include road widening, traffic management improvements, intersection upgrades, or other infrastructure enhancements necessary to accommodate the substantial increase in traffic this development will generate.

4. SETBACK AND HEIGHT CONCERNS

4.1 Inadequate Setbacks

The proposed setbacks are inadequate for a six-storey building:

- **Eastern boundary:** Approximately 3 metres setback
- **Western boundary:** Approximately 3 metres setback
- **Southern boundary:** Not much more than 3 metres, particularly in the southeast corner

These minimal setbacks are completely inappropriate for a six-storey building which will be constructed on top of an existing ridgeline and create significant impacts:

- **Visual bulk:** Three-metre setbacks combined with six-storey height creates a visual wall of development when viewed from neighbouring properties
- **Disproportionate scale:** A six-storey building with 3-metre setbacks is completely out of character with the predominantly one to two-storey dwellings on Rangers Avenue
- **Inadequate transition:** The setbacks fail to provide adequate spatial separation to transition from the six-storey height to the existing low-density residential context

4.2 Comparison with Recent Developments

Recent comparable developments in similar residential areas of Mosman demonstrate that the proposed setbacks are unacceptable. When developments are located as close to boundaries as proposed here (approximately 3 metres), they are appropriately limited to four storeys, not six:

- **Eleve, Holt Street:** Four storeys when close to boundaries
- **Reverie, Myahagh Road:** Four storeys when close to boundaries
- **Phi, Spofforth Street:** Four storeys when close to boundaries
- **Enso, Grosvenor Street:** Four storeys when close to boundaries

These precedents establish a clear and consistent planning principle: developments with minimal boundary setbacks should be limited to four storeys to maintain appropriate scale and amenity.

4.3 Overshadowing Impact

The combination of height and limited setbacks will result in significant overshadowing:

- **Neighbouring properties:** Adjacent dwellings will experience substantial loss of sunlight to private open spaces, particularly during winter months
- **Solar access:** Gardens, living areas, and outdoor spaces of neighbouring properties will lose solar access, impacting amenity and property values

4.4 Visual Impact and Character

The proposed development fundamentally conflicts with the established character of Rangers Avenue:

- **Inappropriate scale:** Six storeys is three times the height of most dwellings in the immediate area, creating a jarring visual impact
- **Heritage context:** The street includes Federation and Victorian homes (including one built in 1890), and this development would dominate and overwhelm these heritage dwellings
- **Streetscape impact:** The minimal setback provides no landscaping buffer to soften the visual impact of the building mass
- **Precedent concerns:** Approval would set a dangerous precedent for similar oversized developments throughout Mosman's established residential areas

To address the negative impact of this proposal on the streetscape, one of the following amendments is essential:

- **Height of the building to be measured from street level:** The height of the building at six storeys may be in line with Low and Mid-Rise Housing Policy (LMR) but ignores the visual impact of building on a ridge line. The building will have the appearance of being seven storeys high.
- **Materially increase setbacks:** The setbacks along the eastern and western boundaries, and in the southeast corner, should be at least doubled (to approximately 6 metres minimum) to provide appropriate separation for a six-storey building;
- **Step the building:** The development should be stepped up along the eastern, western, and southern boundaries, with lower levels (maximum four storeys) near the boundaries gradually stepping up to six storeys only in the building's centre where adequate setbacks can be achieved

5. RECOMMENDATIONS

Based on the significant impacts identified in this submission, we respectfully request that the consent authority:

Refuse the application in its current form due to unacceptable traffic, parking, setback, and amenity impacts; or alternatively

Require substantial amendments including:

- Reduction in building height to maximum four storeys
- Substantial increase inside and rear boundary setbacks proportionate to building height
- Reduction in dwelling numbers to reduce traffic generation
- Comprehensive Traffic Impact Assessment demonstrating adequate road network capacity

- Increased on-site parking provision including adequate visitor parking
- Detailed Construction Traffic Management Plan addressing impacts on Rangers Avenue, Bloxsome Lane and Avenue Road.

Yours faithfully

Lisa and James Landon-Smith
16 December 2025