

I am the homeowner and resident of 11 Holt Ave, Mosman, and I object to the approval of the proposed development, focusing on the following;

11-23 Rangers Ave is not within the LMR outer limit

I live on Holt Avenue and regularly need to enter and cross Spofforth Street by car.

Crossing or entering Spofforth Street from Holt Avenue is often very difficult due to the volume and speed of traffic travelling along Spofforth Street. At certain times of the day, particularly during peak periods, traffic attempting to cross or turn onto Spofforth Street regularly backs up by as many as 15–20 cars. This is a common occurrence, not an isolated one.

In the 15 years I have lived here, I have never crossed Spofforth at Holt Ave to get to the Cremorne shopping centre. It is a busy intersection with 4 way traffic and no controlled pedestrian facilities. The safest and most convenient way to walk to Cremorne shops is to stay on the eastern side of Spofforth and walk directly up to the traffic lights on Military Rd. There is no logical reason you would choose to cross at that location.

Viewing the surveyor map, I can see why the applicant has proposed this route. It allows them to say that the town centre start is much closer than it actually is. The reality is that the nearest public transport point is at the entrance to the centre, on Military Rd, another 50-100 metres further away.

I also note that the surveyor's report relies on the distance from the absolute closest point in the proposed site and does not take into account the total site in their walking distance estimate. I would assume that to be considered within the LMR outer limit, the entire site would need to be within 800m. This is clearly not the case.

In practice, pedestrians seeking to walk safely toward the Cremorne Town Centre would reasonably use controlled crossings, such as the traffic lights at the Spofforth Street and Military Road intersection or the pedestrian crossing at Spofforth Street and Rangers Avenue.

Any walking route that relies on these safer crossings places the properties at 11–23 Rangers Avenue outside the 800-metre walking distance required to qualify for the LMR Outer Area under the Housing SEPP.

Concern regarding built form transition, visual impact, and heritage/scenic values

I am a homeowner and resident at 11 Holt Avenue, immediately north of the proposed development, and our property will be directly affected. The proposed development adjoins land zoned C4 Environmental Living to the north, which has been excluded from the LMR policy due to its environmental, scenic, and landscape significance.

The development does not provide a meaningful built form transition that respects the scale, character, or landscape values of the adjoining C4 zone. Instead, it seeks to maximise—and in some cases exceed—the permitted building height and scale under the LMR policy. This is inconsistent with the intent of the LMR policy to protect the environmental and scenic qualities of areas adjoining C4 zones, including the Holt Estate Heritage Conservation Area and surrounding Scenic Protection Areas.

The applicant's Environmental Impact Statement (EIS) states that the design "sits comfortably within its setting" and that the transition in height is "contextually responsive", but it provides no evidence or justification to support this statement.

The applicant also states that the development would show 4-5 stories at the Bloxome Lane level. If that is the case, the development would tower over the adjoining C4 zone to the north, as well as land to the south and east that falls outside the LMR and within Mosman's Scenic Protection Area. There is no demonstration that the development respects the visual or environmental context of these sensitive areas.

My concern is that the proposed development at that height and form will have a significant and detrimental visual impact on our property, as well as those further up the slope. We have city glimpses from the upstairs of our property, which would be restricted by this development if approved.

The applicant's Visual Impact Assessment incorrectly states that no part of the site falls within or near a heritage conservation area, despite the Holt Estate HCA and heritage-listed trees along Holt Avenue being immediately adjacent. This omission means that the visual impact from the north—directly from Holt Avenue and surrounding properties—has not been properly assessed.

The statement in the Visual Impact Assessment that the development "will be visible in isolation and significantly differ in scale to immediately adjacent low-density development... until subsequent LMR developments are constructed" is also incorrect. The land to the north is zoned C4 Environmental Living and is not part of the LMR. The development would present a stark contrast to the existing scale, landscape, and character of the area.

As a directly impacted resident, I request that the Department require the applicant to provide;

- A revised Visual Impact Assessment that includes analysis from the north of the site, specifically from the northern side of Holt Avenue.
- A detailed view loss and sharing assessment that includes properties to the north of the proposed development, as already requested by the Department.
- The applicant be required to address the misleading statements regarding scale, transition, and the relationship to the surrounding Heritage and Scenic Protection areas.

Community Engagement

Given the significant impact the proposed development will have on our property, I am concerned that the level of community engagement in the application has not taken into account the legitimate concerns of those residents to the north, who will be directly affected by the scale and form of this complex. There appears to be only minimal consideration given to engaging with affected residents.

Holt Estate Heritage Conservation Area

This area includes some of the most iconic heritage streets in the Mosman area, recognised for its avenues of street trees, for which the area is famous. The application downplays the importance and significance of this area. If this development is approved, it will damage existing heritage character and is inconsistent with local planning controls designed to preserve this character.

Conclusion

For the reasons outlined above, I object to the proposed development at 11–23 Rangers Avenue and submit that it should not be approved.

The site does not meet the Housing SEPP requirements for inclusion within the LMR Outer Area, as it is not within a safe, logical, and realistic 800-metre walking distance of the Cremorne Town Centre. The walking route relied upon by the applicant is unsafe, unrepresentative of actual pedestrian behaviour, and understates the true distance. When reasonable and controlled pedestrian routes are considered, the site falls outside the LMR outer limit.

The proposal also fails to provide an appropriate built form transition to the adjoining C4 Environmental Living zone and surrounding heritage and scenic protection areas. The scale and height of the development would result in unacceptable visual and view impacts on adjoining properties, including my home at 11 Holt Avenue, and would undermine the environmental, scenic, and heritage values of the Holt Estate Heritage Conservation Area.

The application is supported by incomplete and misleading visual impact documentation and demonstrates insufficient community engagement with directly affected residents.

Accordingly, the application should be refused, or at a minimum, deferred until the applicant provides a revised and accurate assessment of LMR eligibility, visual and view impacts (including from the north), and heritage and scenic impacts.

David and Susan Hatch

11 Holt Ave, Mosman 2088