Submission on State Significant Development

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

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Submission type: Individual resident submission

Introduction and position

I am a resident of Spencer Road within the Holt–Spencer Road Heritage Conservation Area. The proposed 6–7 storey development at **11–23 Rangers Avenue, Mosman** will be visible from my home and surrounding streets and would materially alter the established skyline, landscape setting and character of the area.

I do not support the proposed development in its current form. In my view, the scale, height, bulk and intensity of the proposal are not appropriate for this site, given its topography, heritage context, environmental sensitivity and constrained infrastructure.

I make this submission strictly in my personal capacity as a resident. While I also serve as a Mosman Councillor and hold the position of Deputy Mayor, and I am a member of the Sydney North Planning Panel, Chair of Mosman Council's Climate Action Committee, and a member of the Active Transport Committee, this submission is not made on behalf of Council or any committee. It reflects my views as an individual resident only.

This submission is written in a comprehensive format because the proposal raises intersecting issues of site suitability, cumulative impacts, and long-term risk. I address planning context, surrounding zoning considerations, built form and visual impacts, heritage setting, excavation and geotechnical risk, flooding and stormwater, traffic and construction impacts, deep soil and canopy outcomes, fauna and biodiversity considerations, the affordable housing claims, the constraints imposed by the limited exhibition timeframe, and matters requiring further information before any determination.

Statutory and planning framework

State Significant Development proposals are assessed under the Environmental Planning and Assessment Act 1979 (NSW). The assessment is required to consider likely impacts (including environmental, social and economic impacts), the suitability of the site, and the public interest.

Recent amendments to the EP&A; Act aimed at streamlining housing delivery do not remove the obligation to undertake a rigorous, evidence-based assessment of site-specific risks. Streamlining cannot be treated as a substitute for accuracy, completeness or conservatism in technical inputs, particularly where long-term public safety, infrastructure performance and environmental outcomes are engaged.

For a proposal of this scale and complexity, a cautious approach is warranted where there are gaps in technical information, unresolved uncertainty (particularly in flooding and geotechnical matters), or where cumulative impacts are likely to be significant when viewed from the surrounding residential and heritage context.

C4 Environmental Living zoning context

Parts of the land surrounding the subject site include areas zoned **C4 Environmental Living** under the Mosman Local Environmental Plan. This zoning reflects a planning intent to protect areas with heightened environmental sensitivity, landscape value and residential amenity, and to ensure

development responds conservatively to site constraints.

While the subject site itself may not be zoned C4, the proximity of C4-zoned land is relevant to assessing site suitability, built form, scale and intensity. Development near C4 land is ordinarily expected to demonstrate a sensitive transition in height, bulk and visual presence, and to avoid outcomes that undermine the environmental and landscape objectives of the zone.

In this context, the proposed height, bulk and massing at 11–23 Rangers Avenue raises concern that it does not provide a graduated transition. Rather, the proposal risks visually dominating sensitive land and eroding the environmental and landscape qualities the C4 zone is intended to protect. This consideration should inform the assessment of appropriateness of scale, the adequacy of built-form modulation, and the overall public interest balance.

1. Local context and site sensitivity

The site at 11–23 Rangers Avenue occupies a constrained location characterised by steep topography, sandstone geology, mature vegetation and a local road network that is narrow and sensitive to construction impacts. These constraints are not incidental. They amplify risks associated with deep excavation, retaining structures, changes to drainage pathways, construction access and staging, and visual dominance.

The surrounding area comprises established residential neighbourhoods with a strong landscape character, including areas within or near the Holt–Spencer Road Heritage Conservation Area. In this context, the capacity of the setting to absorb a large, continuous built form is limited. The landform and canopy typically dominate the visual experience; proposals that invert that relationship require a very high bar of justification and demonstrable minimisation of impacts.

The assessment should therefore treat site constraints as a primary lens through which the appropriateness of scale, intensity and risk is tested, rather than as conditions to be managed later through construction methodology or operational controls.

2. Built form, height and massing

The proposed 6–7 storey built form represents a significant departure from the prevailing scale and grain of surrounding development. On a ridgeline, even relatively modest increases in height can produce disproportionate visual outcomes because the building is read against the skyline and above canopy lines, rather than within a street-wall context.

In my view, the proposal appears to rely on articulation and facade treatment to address bulk, rather than meaningful stepping, separation into distinct volumes, or reduction in overall intensity. Where the building reads as a single dominant mass, the burden is on the proponent to demonstrate genuine, measurable reduction in perceived bulk from key public and private viewpoints.

A more conservative approach would typically involve stronger modulation of height across the site, increased building separation, and a design response that prioritises landscape dominance and the visual continuity of canopy, particularly when viewed from northern streets and from within the adjacent heritage area.

3. Views, outlook and residential amenity

Views and outlook are a substantial component of residential amenity in Mosman and form part of the lived experience of residents. The proposed development risks reducing outlook for residents north of the site and altering the spatial relationship between existing dwellings and the broader harbour landscape.

While views are not an absolute entitlement, the planning system recognises the importance of equitable view sharing and the minimisation of unreasonable impacts. For a proposal at this scale, a proper view and visual impact assessment should test a representative range of affected vantage points, including Spencer Road and other northern streets, and should address the combined effect of height, massing and seasonal canopy variation.

Seasonal variation is particularly important. A view assessment that relies implicitly on maximum foliage conditions can understate winter and shoulder-season exposure. The assessment should demonstrate that impacts are minimised across realistic seasonal conditions, not merely under best-case canopy assumptions.

4. Heritage impacts and setting

The Holt–Spencer Road Heritage Conservation Area derives significance from its cohesive scale, landscaped setting, and the relationship between built form and the surrounding landscape. Heritage impact is not limited to direct adjacency. It includes impacts on setting, skyline, and the broader visual context in which heritage streets are experienced.

In this case, the proposal's height and bulk raise concern that it would introduce a visually intrusive element that changes the established balance between vegetation and built form. Where a new development becomes a dominant background element, it can diminish the heritage character experienced from within the conservation area.

A robust heritage assessment should demonstrate genuine minimisation of impacts through scale and form, not solely through materials, colour palettes, or facade articulation. Where there is uncertainty or contestability in heritage impact findings, an independent peer review is a reasonable and proportionate step.

5. Scenic character and skyline protection

Mosman's scenic character is strongly defined by its harbour-side setting, ridgelines, and tree canopy. Development on prominent or elevated sites must be carefully modulated to protect skyline integrity and ensure that landscape remains the primary visual element.

In my view, the proposal risks eroding the dominance of landscape over built form by presenting a sizeable built mass on a visually sensitive ridgeline. This effect is not limited to immediate neighbours; it can alter broader scenic perceptions from multiple locations where the ridgeline is visible.

The assessment should therefore consider the proposal's skyline profile, the continuity of canopy, and the cumulative scenic implications of permitting similar scale outcomes on comparable sites.

6. Excavation, basement construction and geotechnical risk

The proposal involves extensive excavation to deliver a multi-level basement. Excavation of this magnitude in sandstone introduces significant risks, particularly where the excavation extends close to boundaries and interfaces with local streets, including Bloxsome Lane and Rangers Avenue.

Residents have raised concerns about the extent of sandstone removal, the stability of excavation faces, the long-term performance of retaining structures, and the load that the basement and superstructure will impose. These are legitimate safety and engineering considerations. Where failure or underperformance occurs, consequences can be severe and long-lasting, and responsibility often becomes disputed.

In addition, excavation near a cliff face requires a particularly conservative approach. Excavation can alter stress regimes and groundwater pathways and may increase susceptibility to instability. The assessment should provide clear, conservative geotechnical modelling, construction sequencing detail, and monitoring frameworks (including vibration, movement and groundwater monitoring) that reflect the site's sensitivity.

7. Flood risk, overland flow and water management

Flood risk is a central issue in a proposal involving deep basement excavation and large impermeable footprints. It is highly unlikely that the applicant's flood assessment was able to incorporate Mosman Council's most recent preliminary flood study adopted by Council, or subsequent modelling stages currently underway.

My understanding is that further stages of flood work are being progressed, including work undertaken by Manly Hydraulics. If so, it is important that the consent authority does not rely on outdated or incomplete flood information at the point of determination.

A robust flood assessment for this proposal should consider overland flow paths, basement inundation scenarios, failure modes (including pump failure), the resilience of emergency access routes, and the potential for increased downstream impacts due to altered drainage patterns. Where uncertainty remains, a precautionary approach should apply and further information should be required before any decision is made.

8. Stormwater and downstream impacts

Large-scale excavation and increased site coverage can fundamentally alter local drainage behaviour. Concentrated discharges, altered flow velocities, and changes to infiltration can create downstream impacts that may not be fully apparent from site-based modelling alone.

Stormwater systems should be designed conservatively and should recognise real-world maintenance constraints over the life of the development. Reliance on idealised maintenance assumptions can create long-term risk transfer to neighbours, local streets and public assets.

The assessment should therefore test stormwater performance under a range of credible scenarios, including intense rainfall events, blockage and partial failure, and should demonstrate that impacts on Rangers Avenue, Bloxsome Lane and surrounding downstream pathways are avoided or appropriately mitigated.

9. Traffic, access and construction impacts

Rangers Avenue and Bloxsome Lane are constrained local streets. Construction associated with deep excavation and bulk material removal can generate significant traffic movements, heavy vehicle access requirements, and safety risks for pedestrians and residents.

A construction traffic management plan must be realistic and enforceable. It should specify vehicle routes, turning movements, staging, restricted hours, and measures to prevent unsafe interactions. It should also address the cumulative effect if multiple works occur concurrently in the locality.

Operational traffic impacts also require scrutiny. Driveway design, sightlines, internal manoeuvring, queuing and service vehicle access should be demonstrated to meet safe and practical standards, particularly given the constrained nature of the surrounding road network.

10. Deep soil, canopy and landscaping outcomes

Deep soil and canopy are critical to Mosman's local character, biodiversity, urban cooling and resilience. Where proposals reduce true deep-soil areas and rely on podium or on-slab planting, long-term canopy outcomes are often diminished.

On-slab planting generally cannot replicate the ecological and canopy value of mature trees, particularly over the timeframes relevant to climate resilience. The assessment should therefore be transparent about the extent of true deep soil, the canopy outcomes achievable, and the likely timeframe for replacement planting to deliver meaningful canopy.

Given the site's prominence, maintaining a landscape-dominant character is particularly important. A reduction in canopy and deep soil can also exacerbate heat and stormwater impacts, compounding other concerns in this submission.

11. Fauna and urban biodiversity

Bats and native birds utilise vegetation in this area for feeding and movement. This use is observable and cyclical at different times of the year, indicating established patterns rather than incidental activity.

In particular, a mature tree located outside my home on Spencer Road, directly behind the subject site at 11–23 Rangers Avenue, is cyclically utilised by bats and native birds for feeding. This observable seasonal use indicates that the area functions as part of an established feeding and movement corridor.

Fauna impacts can arise not only from removal of trees, but also from changes to lighting, increased built mass, loss of connectivity, and construction disturbance. The assessment should address whether targeted fauna surveys were undertaken (including consideration of microbats), and should evaluate lighting impacts and proposed mitigation.

12. Affordable housing component

I support genuine affordable housing outcomes. Where affordable housing is cited as a public benefit, the details of delivery must be clear, enforceable and proportionate to the scale uplift being sought.

The assessment should clearly describe eligibility criteria, pricing mechanisms, duration of affordability, management arrangements, and the practical likelihood that the dwellings will operate as truly affordable over time rather than as short-term or nominal affordability.

Where public benefits are relied upon to justify increased height or intensity, it is in the public interest that those benefits are transparent, durable and appropriately conditioned.

13. Limited exhibition period and constraints on meaningful engagement

The public exhibition period for this proposal is limited to a standard 14-day notification period. While this timeframe may meet minimum statutory requirements, it does not support meaningful or informed community engagement for a proposal of this scale, complexity and potential impact.

The proposal involves extensive excavation, significant changes to built form and skyline, heritage setting impacts, flood and stormwater risk, traffic and construction impacts, and environmental considerations including fauna and habitat. These are not matters that can reasonably be understood, tested or responded to by residents and independent experts within a two-week period.

The exhibition timing has also coincided with a period of constrained availability for many residents and professional advisers. This further limits access to expert review and increases the risk that important impacts and technical gaps are not fully identified prior to determination.

In these circumstances, the consent authority should adopt a cautious approach. Where information is incomplete or contested, further information should be required and any determination should be deferred until assessment can be properly completed on a complete and current evidence base.

14. Public interest and cumulative impacts

The issues raised above interact and compound. Visual dominance, heritage setting impacts, excavation risk, flood and stormwater uncertainty, traffic constraints, reduced deep soil and canopy, and biodiversity impacts should be assessed cumulatively rather than in isolation.

When considered alongside the proximity of C4 Environmental Living zoned land, the cumulative visual and environmental implications are amplified. The zoning context underscores the need for conservative transitions and outcomes that protect sensitive landscape character.

A proposal that appears manageable when impacts are viewed separately can become unsuitable when cumulative effects are properly accounted for. In my view, the cumulative impacts in this case indicate that the proposal represents an overdevelopment of a constrained and sensitive site.

15. Matters requiring further information before determination

Having regard to the limited exhibition period and the complexity of the issues raised, the following matters require further information, clarification or updated assessment prior to any determination:

- Updated flood modelling and risk assessment incorporating all recent Council flood studies and subsequent modelling stages currently underway (including work undertaken by Manly Hydraulics, if applicable).
- Detailed geotechnical assessment addressing deep excavation in sandstone, retaining design principles, boundary interface risks, groundwater pathways, and conservative construction sequencing and monitoring.
- Expanded visual impact and view analysis including representative northern viewpoints (including Spencer Road) and consideration of seasonal canopy variation.
- Enhanced heritage impact analysis addressing setting and skyline impacts on the Holt–Spencer Road Heritage Conservation Area and consideration of independent peer review.
- Construction traffic management plan that is realistic, enforceable and demonstrates safe vehicle movements and pedestrian safety on constrained local streets.
- Fauna and biodiversity assessment that includes targeted surveys where appropriate (including microbat considerations), assessment of lighting impacts, and demonstrable mitigation and replacement canopy outcomes.
- Clear, enforceable details of the affordable housing component, including eligibility, pricing, duration, governance and conditions to ensure delivery of durable affordability.
- A consolidated cumulative impact assessment that integrates built form, heritage, geotechnical, flood, traffic, canopy and biodiversity considerations.

Conclusion

For the reasons outlined in this submission, **I do not support** the proposed State Significant Development at 11–23 Rangers Avenue, Mosman.

In my view, the proposal represents an overdevelopment of a highly constrained and sensitive site. The cumulative impacts arising from excessive height and bulk, visual dominance, heritage setting impacts, deep excavation in sandstone, unresolved flood and drainage risk, traffic and construction impacts, loss and fragmentation of urban habitat, and lack of clarity around claimed public benefits render the proposal unsuitable in its current form.

I respectfully request that the consent authority refuse the proposal as exhibited. At a minimum, and prior to any determination, the further information and updated assessments identified above should be required and rigorously considered, and any future iteration of the proposal should demonstrably reduce scale, intensity and risk to a level consistent with the site’s context and the public interest.