

Feedback: 11-23 Rangers Road SSD:96272465

Dear Sir/Madam

I write as a local resident with great familiarity with the proposed location and would like to provide feedback on this proposed development.

I strongly object to this SSD proposal and do not believe it has strategic merit on the following grounds:

Adverse Impacts to the Mosman Scenic Protection Zone

Contrary to the applicant's EIS and Appendix CC - Visual Impact Assessment, **the SSD site is highly visible from many parts of the local area and will have major negative impacts on the integrity of the visual character of the existing area.**

The proposed site is located at one of the highest points on a ridgeline overlooking Mosman Bay with uninterrupted views from the southern side (front) down to Sydney Harbour. **It is highly visible from many parts of Mosman.**

The photos below provide evidence. The site is highly visible from multiple parts of Upper Avenue Road and the surrounding neighbourhood from the public domain (pedestrian footpaths and roadways) as well as from private dwellings.

The site will also be highly visible from Reid Park in Mosman Bay. The current house at 21 Rangers Road is currently two stories with a pitched roof and is visible above the tallest trees of Reid Park (see photo). If the proposed apartment building is allowed to proceed, given that it will be at least 3x the size of the height of the current house that exists at 21 Rangers it is certain that the development WILL be highly visible from Reid Park from multiple aspects. **This will have detrimental impacts on the special aesthetic quality that contributes to Mosman's special scenic values.**

My photographic evidence therefore provides evidence that contradicts the applicant's claim that "Visibility to the proposal from close parks such as Reid Park is limited by the relative viewing level and dense vegetation".

My photos from Upper Avenue Road also provides evidence which contradicts the applicants false claim that *"The proposal will occupy a small proportion of any view from within the SPA including sensitive foreshore locations, and is compatible with other visible built forms within the SPA"*

This proposed development therefore does not enhance the public domain or local character.





Adverse Impacts on Heritage

The proposed development will be highly visible from the public domain as well as impacting visual amenity of residents in Holt Avenue and Spencer Road. These two streets comprise *The Holt Estate Conservation Area* and were designated as a heritage conservation area (HCA) by Mosman Council following an independent heritage assessment by Godden Mackay Heritage Consultants in 1996 for their significance as “*a complete early subdivision containing a great many buildings from its original residential development*”. Within this HCA each dwellings are ranked individually for their heritage significance. There are 7 dwellings directly behind the proposed site (northern side) on Holt Avenue which are ranked as “**Contributory – 1**” items. These are **20, 22, 24, 28, 32, 34, 36 Holt Avenue**.

The impact on the HCA overall is not adequately analysed by the applicant and a detailed Heritage Impact Assessment by an independent heritage consultant should be mandatory. A detailed Heritage Impact Assessment on each of the Contributory – 1 ranked dwellings should also be provided by an independent heritage consultancy.

A comprehensive heritage assessment on 21 Rangers Avenue should also be required. Whilst currently this dwelling lacks heritage protection, it was built c1890 and its facade presents as an intact original dwelling with period features. The assessment should be carried out as per Heritage NSW guidelines and include a comprehensive study that:

- investigates the historical context of the dwelling
- investigates the community’s understanding of the dwelling

- establishing if the dwelling contributes to any local historical themes and relate them to the state themes
- investigates the history of the dwelling (occupants)
- investigates the fabric of the place or object.



21 Rangers Avenue

Given the major impacts the development will have on the Holt Avenue HCA and individual contributory items, **I strongly object** to the claims made within the applicant's 'Assessment of social impact'. The development will have a high negative social impact on existing and future residents and the Cremorne and Mosman neighbourhoods. The proposed visual changes will be highly visible and **does not contribute** to improved amenity of the immediate location as well as the social location. It does not enhance public domain and local character.

Justification for LMR - infrastructure

I object to the applicant's justification for LMR development for the following reasons:

The Cremorne Town Centre does not provide a 'full line supermarket' – it is approx. 1496 sqm, which is much less than the >2500 sqm that defines a 'full line supermarket'. The current IGA supermarket is sufficient for a small grocery shop, but does not stock a full set of grocery items. It lacks the infrastructure of larger supermarkets and does not have full-size/length check-out registers which would enable large grocery purchases, thus necessitating additional shopping expeditions to other larger retail centres such as Neutral Bay or further afield eg Crows Nest or Northbridge.

Cremorne also lacks a full range of financial services such as banks and lacks the variety of retail shops providing goods and services available at larger centres.

The Cremorne Town Centre also lacks the transport infrastructure and capacity of larger centres such as Neutral Bay. The **express B-line service does not stop at Cremorne** at all. Some express buses do stop at Cremorne but only during peak hours. The bus stop at Cremorne Junction is also constrained by physical location and capacity. In the morning

peak the bus stop moves a block towards Spencer Rd with long queues of passengers crowded in a small area. The bus stop outside Cremorne Town Centre only operates from 10am onwards during Mon-Fri.

Affordability

The extra height bonus sought by the applicant based on the provision of including a component of “affordable” homes within the development. However, Mosman has one of the highest market rents in Sydney and given that this development proposes luxury fit-outs and appliances it is unfathomable that it will be actually ‘affordable’ to key workers on low to moderate incomes households (eg teachers, health workers, hospitality staff and aged-care workers) even if offered at below market rates.

According to the report *‘Renting in 2026: The income you need to earn to live where you want’* a six-figure income is needed to be able to meet the rental payments in premium areas of Sydney. The report stated “To rent a 2-bedroom place in Mosman (2088), you generally need an annual income around \$130,000 to \$170,000+, as median rents range from roughly \$830/week (units) to over \$1,000/week for houses, requiring 30% of your income to cover it, meaning you need substantial earnings for Mosman's high-end market”

However, a perusal of rental listings online shows that the average apartment rental in Mosman with similar high-end facilities as those planned for this SSD **is well over \$1000 per week.**

Real Estate Rental listings Mosman week commencing 15.12.25

00/50 Botanic Rd, Mosman, NSW 2088

2 bedroom apartment - \$1,300 per week

407/46-54 Harbour Street, Mosman, NSW 2088

2 bed, 2 bath, 1 car Apartment - \$1,250 per week

<https://www.realestate.com.au/property-apartment-nsw-mosman-442985620>

2A Park Avenue, Mosman, NSW 2088 (50m from the SSD site)

3 bed, 2 bathroom, 2 cars – Apartment - \$1,850 per week

<https://www.realestate.com.au/property-apartment-nsw-mosman-443039016>

A typical essential workers does not earn a six-figure income and even if the proposed “affordable” apartment component of this SDD proposal offered rents below typical market rates, eg 20–25% less than market and were capped so they cost no more than 30% of a

household's gross income, it is unlikely that the essential worker would be able to afford to live in this proposed development.

I therefore **object to the height bonus rationale** proposed by the applicant to justify this development as state significant.

Traffic – road network

Capacity and infrastructure

The surrounding road network is currently at capacity during weekday peak periods and often at weekends (Spofforth Street, Rangers Road, Murdoch St, Holt Avenue). In particular Rangers Road and Rangers Avenue are “rat-runs” used by motorists (using Google directions) to traverse through the Kirribilli-Cremorne-Mosman route. This is a “short-cut” avoiding congestion on Military Road to enable motorists to get to major local attractions including Balmoral beach, Taronga Zoo, Headland Park Mosman and Mosman village.

Traffic in Spofforth St and Holt Ave (Cremorne side) is frequently at standstill in the morning peak and weekends. This photo shows a typical queue of vehicles seeking to join Military Road from Holt Ave and is evidence that the existing road network is at capacity.



Holt Avenue, Cremorne looking northbound

10.12.25 at 315pm

Safety issues with the Exit and Entry to proposed apartment building

The applicant proposed that vehicle entry and exit will be sited on Rangers Avenue. However, no mention is made of the fact that Rangers Ave is a single lane road in each direction with a double-yellow line at the median preventing overtaking or any type of turn. However, as the quickest route to travel across the Sydney Harbour Bridge or Tunnel or the Pacific Highway is via Military Road, there is a high likelihood that residents of the proposed development will seek to turn right out of the proposed basement carpark to travel west, rather than using the roundabout at Park Ave on the eastern side. The alternative is to travel east towards Avenue Road and then left onto Cowles Road but this may be perceived to be a longer route

Safety issues at Holt Ave and Spofforth St intersection

The intersection of Holt Ave and Spofforth St has a long history of multiple vehicle accidents which has been documented by a local community group, Harrison-Bennett Precinct. North Sydney Council and Mosman Council are also aware of the traffic safety issues.

A more detailed Traffic Management study of the surrounding road network needs to be undertaken and be made available for review by public exhibition.