

Objection to SSD-90134958 (100 Edinburgh Road, Castlecrag)

Dear Fiona Dowler,

Please refer to the below concerns raised over the proposed SSD at 100 Edinburgh Road, Castlecrag:

1. Concerns over bulk and scale

The proposed bulk and scale of the development, seeking two towers at 13 storeys each, is a gross overdevelopment of the site. The bulk and scale of the proposal is inconsistent with the streetscape and local character of Castlecrag, does not respect surrounding development, and will be a stain on the neighbouring Griffin Conservation Area.

An analysis of the surrounding development of the Castlecrag local centre and surrounding R2 and C4 zones shows that the development as proposed will cause unprecedented overdevelopment to the area.

The development proposes an FSR of 4.2:1 and a height of 48.96m. When compared to the LEP controls of 0.25:1 and 8m, the proposal represents a gross misuse of planning provisions (SEPP Housing bonuses) and gross overdevelopment of the site.

As a town planner working in local government myself, consideration must be given to how the development will realistically look in comparison to surrounding lots if approved. The towers will look ridiculous and out of place next to such low scale development. There is no precedent for 13 storeys anywhere in the wider area, with Northbridge perhaps the most built up at 5-6 storeys. 13 storeys is double any other development in the wider area. The location of the development will and surrounding low density C4 and R2 zones will not allow for a 'tiered' approach to development. 48.96m immediately to 8m is not a good outcome nor a good planning or development approach. Consideration must be given to reducing the proposed height.

2. Height

The proposed height is inconsistent with the streetscape and adjoining R2 and C4 zones. 13 storeys immediately dropping down to 8-8.5m in the R2 and C4 zones is ridiculous and will cause unsightliness. The proposal does not respond to surrounding local character, height and scale.

It should be highly advisable that no or little extra height be afforded to the proposal, given the negative impacts it will have on the streetscape and surrounding residents. The height, if approved, will set a detrimental precedent for further overdevelopment in the area. As the zoning suggests, 100 Edinburgh Road is a "local centre", where local shops and low to medium scale density is typical of the area.

3. Loss of visual privacy to adjoining properties

The height and scale of the proposal will cause incommensurate impacts of overlooking and loss of visual privacy to adjoining and neighbouring properties. Residents of the apartments, if approved, will have unobstructed views into the private open space of surrounding residents, given the area is characterised by low density dwelling houses.

Furthermore, the location of southern elevation balconies will directly look into the private open space of neighbouring residential properties to the immediate (and further) south. Design consideration and a reduction in the scale of the proposal must be considered.

4. Overshadowing

The height, bulk and scale of not one but two towers will cause adverse impacts of overshadowing to adjoining and nearby properties, where access to sunlight will be virtually eliminated from the private open spaces of many low density residential lots. This should be highly considered and addressed.

The site's northern and southern side boundaries will all but eliminate solar access to properties to the immediate south of the subject site, particularly properties along the Postern and The Rampart. These areas are largely zoned C4, where access to the natural landscape is a key objective of the zone. The total elimination of sunlight to the southern properties will decimate any access to sunlight for residents, and the natural landscape, destroying the character and objectives of the C4 Zone.

5. Incompatible and inconsistent with surrounding development

The proposal will be a blot on the streetscape of Castlecrag and Willoughby. While Eastern Valley Way (heading towards Northbridge) hosts many low to medium scale developments, the proposal is for a high density and large scale development. The site's original approval for a 3-5 storey development is consistent with surrounding development in the area.

Medium density development is needed and welcomed in the general Willoughby area. However, the proposed two 13 storey towers make a mockery out of surrounding development. The proposal is a gross and incompatible intensification of the approved use of the site.

Furthermore, the topography of the subject site on top of a hill will cause extreme bulk and scale issues, causing unsightliness to passerby, particularly when driving northbound along Eastern Valley Way towards Middle Cove. The proposal if approved will cause a looming tower, being one of its kind in the local vicinity.

6. Intensification of use and overdevelopment of the site

The SSD seeks to intensify the previously approved development consent for the site. The proposal of two towers at 13 storeys each. This represents a gross intensification and overdevelopment of the site, which used to host a low scale shopping village and had subsequent approval for a 3-5 storey mixed use building.

The original approval of a 3-5 storey complex is much more in keeping with the surrounding scale of development. The assessment undertaken by Willoughby Council was thoughtful and articulate, given the local council has a detailed and well informed understanding of the suburb. The current SSD seeks to undermine the careful and precise work of Willoughby Council, bypassing the needs of the community.

7. Negative impact on streetscape

The design of the building, bulk, scale and height will cause unsightliness and a negative impact on the streetscape and wider suburb. The proposal, as modified from the original DA,

will cause a negative impact on the streetscape due to its incompatibility with the wider surrounding residential development. Furthermore, the proposed materials and finishes are incompatible and inconsistent with the streetscape.

8. Negative impact on the Griffin heritage conservation area

Part 2.1 of WDCP states design consideration must be given to setting, scale, massing and form, proportion and detail. Although not located directly inside the conservation area, the development is located immediately adjoining the HCA. The proposal does not meet the controls and desired outcomes of the Griffin HCA, which emphasises the natural landscape.

Part 3.5.6 of the WDCP states the following controls and objectives:

- Maintain and where possible reinstate natural topography, landforms, the natural ecology/drainage ways and ponding areas, and vegetation types.
- Buildings should be placed to respect natural features which historically has resulted in a variety of setbacks. This principle should be adhered to in new development.

Given the site's location and topography on the top of a hill, the proposal does not respect the existing landscape and will produce an inconceivably bulky development. This development will overshadow the HCA and cause unsightliness.

9. Materials and finishes inconsistent with the Griffin HCA

The proposed materials and finishes are inconsistent with the streetscape of the Edinbrugh Road local centre and Griffin HCA. While some sandstone is proposed, more natural materials (such as sandstone) should be utilised. The streetscape favours brick, trees and landscaping and sandstone, reflecting the Griffin HCA. The materials and finishes should be revised.

10. Development to set a precedent

Castlecrag is loved for its low density, natural landscaping and heritage. The development will set a precedent for high density commercial development, which is not in keeping with the character of the suburb. While development and more housing is a welcome and a much needed thing in Sydney, unique suburbs such as Castlecrag must also be protected from overdevelopment.

11. Increased traffic to Eastern Valle Way and Edinburgh Road

The proposal of 150 apartments over two towers will provide even further traffic congestion along Eastern Valley Way and Edinburgh Road. This intersection already experiences high traffic pressure, particularly during peak hours. Insufficient public transport options are available to readily absorb the increase of residents. Local roads are already at capacity.

12. Not in the public interest

The proposal does not align with the EP&AA Act, as the development is not in the public interest. The proposal is utilising bonuses afforded by the Housing SEPP under affordable housing. This is ironic given the median property price in Castlecrag, which is one of the most expensive suburbs in Sydney and Australia. Affordable housing is not possible in Castlecrag, particularly within proposed luxury apartments with water views.

Furthermore, the proposal is staunchly an antithesis to the interests of surrounding Castlecrag and Willoughby residents, who vehemently oppose the proposal. While Principle Planning consultants have on paper “responded” to the community through consultation, this is a farce. When asked questions at community meetings, the present planners were unhelpful and barely answered community concerns. All forms of “consultation” were purely to put in the Community Engagement Outcomes Report, prepared by Principle Planning.

13. Inconsistency with objectives of the Willoughby Development Control Plan

The WDCP states the following objectives for commercial development:

- ensure a high standard of urban design that makes a positive contribution to the streetscape and reinforces the importance of pedestrian areas
- provide a satisfactory transition and minimises any adverse effects between commercial uses and adjacent residential areas

The proposed SSD development does not align nor meet these objectives, given the bulk and scale of the development.

Furthermore, 4.1.1 of WDCP states:

- new development should reinforce existing roof forms, building height and proportions of building elements, including any distinctive parapets, gables, or ridges
- the design of new buildings or alterations and additions must retain the stylistic or architectural character of the commercial precinct, particularly in heritage conservation areas

These controls are not being met, where from an urban design perspective the proposal is inconsistent and incompatible with the character and scale of surrounding development in the Castlecrag local centre.

For further questions please do not hesitate to contact me.

Hannah
0329441617
Hannah3laws3@gmail.com