

SUBMISSION – proposed SSD at 100 Edinburgh Rd, Castlecrag

I strongly object to this proposal for 13 – 15 storeys that includes twin towers for 150 apartments (10 affordable for 10 years), 48.96 metres tall, 376 car spaces, at 100 Edinburgh Rd on the corner of Edinburgh Road and Eastern Valley Way, Castlecrag.

The site adjoins the Griffin Heritage Conservation Area (C4) on its eastern and southern boundary, and abuts heritage item I253 (the Griffin Centre).

In short , this high rise twin tower proposal set atop the ridgeline in the peninsula suburb of Castlecrag, amongst low rise dwellings will cause irreversible harm to the local character, environment and heritage of Castlecrag and surrounds.

The 100 Edinburgh Rd site currently has a DA (DA-2024/13) approved by WCC and the SNPP in November 2024. The DA includes 38 apartments, residential and retail parking, a supermarket anchor tenant, 3 storeys from Edinburgh Rd and 5 storeys at the rear of the site, where the topography falls away. It was approved, following extensive community consultation, with overwhelming support from the community.

This now proposed supersized development would loom over the Griffin Conservation Area, dominating the unique and internationally renowned model suburb, Castlecrag and its small 'village' style shopping centre conceived and designed by visionary architects and urban designers, Walter Burley Griffin and Marion Mahony Griffin.

The Griffins designed the Castlecrag Estate and the Haven Estate 'in sympathy with the natural environment'. Accordingly, the height scale, bulk, massing and proportion, site cover, location and visibility of new development must be such that:

- built forms are subordinate to the natural landscape;
- the spacing between buildings and rhythms of the street scapes are retained and opened up to create vista of the natural landscape;
- buildings are highly articulated in plan and elevation, and
- primary views from nearby and adjoining dwellings and public reserves, roadways, paths and drainage reserves are not obstructed.

Willoughby City Council ('WCC') has recognised these principles in Willoughby LEP and Willoughby DCP and over the years much has been done by WCC, with strong community support and direction, to uphold these and the other Griffin principles in Castlecrag.

The proposal is noncompliant in so many respects that I fully expect it should be rejected outright. If approved I have absolutely no faith in the current NSW Government and Department of Planning that would by-pass so many planning laws to approve a building of this excessive height in the heritage suburb of Castlecrag. A building of this size should properly be restricted to the designated growth areas Chatswood, St Leonards or Crows Nest where it belongs.

Some of the most glaring non-compliances under Willoughby Local Environmental Plan 2012 (WLEP) and Willoughby Development Control Plan (WDCP) include:

- The maximum height of building is 9 metres. The proposal is 48.96 metres, which is 5.4 times the limit;
- The maximum floor space ratio is 1 to 1. The proposal is 4.2 to 1, which is 4.2 times the limit;
- The current proposal exceeds even Council's endorsed planning proposal by more than double on both height and floor space. (In 2023, Willoughby City Council went through a formal planning proposal process and endorsed a more modest uplift

of FSR 1.8 to 1 and AHD 97.49 ie about 11 metres above Edinburgh Road).

There are no buildings of such a height in the surrounding areas of Willoughby LGA apart from St Leonards and Chatswood. Chatswood CBD contains sufficient high rise for the whole of Willoughby LGA. (Willoughby LGA has already exceeded its housing requirements imposed by the Government of NSW.)

The excessively tall proposed twin towers will stick out from the site like a sore thumb at the gateway to the Castlecrag peninsula. It will be visible from afar.

The proposal is also non-compliant in so many other respects:

1. The Housing SEPP “bonus” provisions the applicant relies on contextually do not apply to the site.

The applicant repeatedly suggests that the Low and Mid-Rise Housing (LMR) provisions and the Infill Housing 30 per cent provisions of the State Environmental Planning Policy (Housing) 2021 justify the scale of the proposal. They do not. The applicant itself concedes:

The site is 850 to 900 metres from Northbridge town centre (EIS, page 47). This is outside the 800 metre walking-distance radius that triggers LMR eligibility.

Even if the LMR provisions did apply to the site (they do not), the maximum height under LMR for shop-top housing is 24 metres and the maximum FSR is 2.2 to 1. The proposal is roughly double both LMR ceilings.

2. The site is not in a transport-oriented development (TOD) zone and has limited public transport. The nearest train stations Artarmon and Chatswood are 2.56 to 2.93 kilometres away; there are no metro

or light rail services; bus services are limited outside morning and early afternoon peak hours.

3. The applicant has chosen the SSD planning referred to some bonus provisions that do not actually apply. There is no statutory basis for a development of this scale on this site.

4. Overshadowing to southern properties is excessive and does not meet planning requirements for winter solar access. These properties are likely to lose meaningful sunlight for extended periods, potentially up to six months of the year.

Apartments with no direct winter sun: 30 per cent. The Apartment Design Guide requires maximum of apartments receiving no direct winter sun to be 15 per cent.

5. Affordable housing benefit is small and short lived: 10 of 150 (6.67 per cent), for 10 years only which is below the Housing SEPP minimum of 15 years. Council requested perpetuity. Further, the proposal will not address housing affordability as it proposes high-end luxurious units/apartments as would be expected in Castlecrag.

6. Vehicle numbers increase greatly, with parking increasing from 163 in DA-2024/13 to 376 spaces.

The limited public transport out of Castlecrag means that many Castlecrag residents are forced to use their cars especially to and from work. The increased number of vehicles should the proposal be approved, will invariably lead to large traffic jams into and out of the peninsular suburb (one road in and one road out). Such increased congestion and extra burden on the local intersection- traffic lights from Castlecrag may restrict access for medical evacuations from the local hospital and other emergency services at the extended peak periods.

The proposal flies in the face of good planning. I support development, as I fully support DA-2024/13, but it needs to be the right development in the right place for our community.

The community survey appears to agree. 89% concerned about height; 83 % about traffic. 83 % about local character. Only 2 of 66 (3%) had no major concerns.

So, to conclude, I ask for this proposal to be rejected outright and would hope that the developer is able to proceed with existing DA-2024/13 which I am certain would have the support of the community as a whole.

Regards

Jill Newton