

CASTLECrag APARTMENT DEVELOPMENT PROJECT - SUBMISSION

BACKGROUND

This submission is in relation to the proposed development project located on the junction of Eastern Valley Way, Willoughby NSW and Edinburgh Road, Willoughby NSW.

The project is said to consist of two (2) 11-storey apartment blocks made up of 150 apartments as well as a shopping complex. The proposed development is also said to provide a car park designed to provide sufficient parking space and facilities for the residents and owners of the apartments contained within the proposed block of apartments. In addition to this parking facility, it is understood that parking for customers attending the shopping complex will also be catered for.

INTRODUCTION

This submission is lodged in opposition to the proposed development of this 2 x 11-storey apartment complex said to be located on the junction of Eastern Valley Way, Willoughby NSW and Edinburgh road, Castlecrag NSW (the “project”).

It is understood that the proposed development follows a previous and approved proposal for the construction of a 3-4 storey building apartment block (including a shopping complex) which was subsequently not proceeded with but essentially sold off to another developer who has chosen to extend and expand upon the previous proposed plan.

SUBMISSION

The following submission will in all likelihood replicate the thoughts and submissions of other interested parties. However, no review of other submissions has been undertaken in the preparation of this submission. Nor has any reference has been made to either or any of such submissions or the outline of elements provided by the major party opposing the project, except for noting the headline topics to be addressed.

Attempting to provide an orderly approach to this submission, I outline the following points in support of the argument opposing the construction of this project.

Original Proposal

1. The original proposal, which has no doubt been referred to as well as being addressed and described by other parties making submissions, in broad terms consisted of a proposed building of 3 levels of residential living as well as a shopping complex arrangement
2. The sale of this original proposal appears to have led to an amended structure which is almost 3 times the size (and scale) of the original. This is a remarkable alteration and one which raises and would no doubt have raised questions as to the rationale of the significant change.

3. This submission seeks to maintain respect for the respective parties though at times criticism of the project will touch upon some emotive responses and reactions to the project, its supporters and perhaps even bureaucratic processes. In this regard, the initial reference to the relatively huge change to the size of the original project/proposal attracts the view that it is no more than a matter of greed and self-interest rather than a communal approach to the project and its community.
4. In following from this emotive approach, perhaps consideration should also be given to the equation of providing and defining 10 out of 150 units as being classed or classified as “*affordable*”. To whom are these units applicable to and how is “affordable” defined in the context of the Project as well as that of Government policy? Is there a comparator available in identifying (and therefore comparing) the “affordable” units with those “non-affordable” units? What will be comparable price of “affordable” and “non-affordable” units? Who will purchase and/or rent these “affordable” units?
5. It would seem that 2 high-rise blocks of 11 storey’s may also affect the environmental aspects of the community and surrounding locales. This area of environmental effects should surely be addressed under the relevant environmental legislation and appropriate jurisdiction. Compare this proposal with the original plan of a 4-storey level structure and the reasons for this significant difference between the 2 proposals. No doubt argument and submissions are already in place and/or would have been raised and debated prior to the opportunity of community members to make submissions. However, surely on this question alone, this debate has not been concluded.
6. To add to both the emotive reference above as well as the matter of the environment, the size of the proposed project may also be seen in the concept of having the highest building in the immediate as well as in the surrounding area – the “king of the castle” approach!! Again, a substantially different approach to that of the original proposal which would appear to have been in line with the size of the surrounding structures.

NSW Government building projects

7. Question whether this Project seeks to take advantage of the recent ***NSW Government’s Regional NSW plan***. This Project would not fall into that category (by definition not being a “regional” area). However, the nature of the Project coincidentally falls into the realm of such an approach or consideration, particularly with the reference to “affordability” which would require significant explanation or attempting to fall into that categorisation. If that be the case, then surely this is a misleading, false and demeaning approach.
8. It would appear that this project should not fall within the Government’s strategic housing planning fund. However, my submission refers to this plan to seek confirmation that the Project does not seek to take advantage of the fund/plan and under the guise of “affordable” does not mislead the community or others outside this community and so any potential renters and/or buyers of the 10 out of 150 units (6.67% of the number of total units).

Comparative projects

9. The matter or question of comparative projects is raised in the following section and is an attempt to try to provide a comparison and/or alternative view of this Project to other locations, which subject to their own ownership, usage and location, provide questions as to the reasoning of the construction of the proposed Project.
10. The example set out below – *Redfern – Strathfield rail line* section (paragraph #19) – provides a closer reality situation to transport options that what the proposed Project offers. A situation which this Project/proposal fails dismally, on.
11. While others will have provided more detail and detailed explanations than this submission does, it would be assumed that the principles would be the same – such as and including the effect of vehicle use on the current environment. Obviously a community adjusts to significant developments. However, in consideration of the location of the proposal, on the junction of one very busy road (Eastern Valley Way – “EVW”) and co-joined with another busy road (Edinburgh Road) that links to that road (EVW), this structure will create a significant bottle neck and potentially dangerous accidents and incidents.
12. Since the end of the COVID pandemic, the density and increase in traffic along Eastern Valley Way has increased substantially. Traffic along EVW has changed (increased) significantly from the period preceding the pandemic. Whilst no statistical information is provided here, observations of having lived on Eastern Valley Way for a significant period of time have seen this significant change in the level of road usage.
13. Combining the increase in traffic along EVW and also Edinburgh Road to access the CBD and other suburbs in the area in question, will only be exacerbated with the increase in traffic by owners/renters and residents of the proposed project should the project as is proposed, be approved. A junction that may be questioned in terms of size and capacity to deal with what would amount to a significant increase in traffic.
14. Questions emerge concerning the proximity of the nearest railway stations – Artarmon or Chatswood: how does the proposed project assist with this aspect of transport? It appears that it doesn't address: either train or bus or individual vehicle usage (both domestic/work related and commercial – vans, trucks, etc.). What research has been undertaken by the Developers of this project with respect to not only the immediate vicinity of the project, but also traffic aspects of approaching and utilising this corner? If such research has been undertaken by either or both the Developer and any governmental agency (i.e., State Government or Council) or authorised body, where is the research and what are the outcomes of such or related research?

Project considerations

15. Many opposing submissions will have likely addressed specific and immediate areas of concern. These areas of concern should not be disregarded as they would reflect the immediate and direct impact of the proposal upon their way of life and related aspects.
16. This submission has not accessed and so has not reviewed other submissions. This submission (and it is assumed, other submission opposing the project) sets out the above opposition and the following points based on what are considered to be realistic and practical reactions and responses by local residential and affected concerns.
17. Turning to the matter of the size of project. The proposal to construct 2 buildings of 11-storey's height (75 units in each block and presuming (?) 10 "affordable" units across both blocks) is, respectfully, a gross misdemeanour. We are looking at an area where the highest building in this said area – in fact across the road from the proposed project, sits at 3 levels. From an environmental point of view, such matters should support the opposition and rejection of the proposed project. No doubt sufficient case law exists, to reject such a high proposal including environmental considerations.
18. Further to this, one might consider that the *New South Wales Government's* approach to housing – both implied as well as actual: that of assist low cost housing. It would seem that this project does not met that principle and commitment. Firstly, at the risk of being considered 'poshy' or 'upper class', I am not. In any event, I reject any such inferences. I come from the Hunter Valley and grew up in a low cost working class environment. I live with my wife in a simple little 2 bedroom house. I raise the question and/or query that the area in question – the lower north shore – is not a low cost area. Secondly, I raise this point of low cost housing because this area is not a low cost housing area and that would not fit into the scope of housing considered by the Government, notwithstanding the point that the Government's housing planning appears to focus on regional areas of NSW. Thirdly, if the developer or a supportive party(ies) infers and/or assumes that a reference to "affordable" housing applies to 'some ' of the said apartments, then this submission considers such an inference as misleading. I vote Labour and consider the Premier as one of our most trusted and honourable leaders and persons in Australia. So, I consider that anyone who attempts to fit this project into the Premier's scope of housing, whether directly or indirectly referring to "affordable" (housing), is kidding themselves. Such presentations would, respectfully, abuse the housing planning. This would be seen by surreptitiously arguing, by reference to "affordable" housing, as seek to provide an image of adopting (albeit in a different environment – *urban v regional*) Government planning concepts and so would be wrong.
19. Perhaps this developer and other developers should catch a train to *Burwood* (ref. paragraph #11, above) and consider the warehouses situated along the railway line. Some of these buildings appear to ones which may more readily conform with opportunities for low cost housing with subsequent renovation and renewal. These buildings appear to be within close access to transport facilities such bus and rail, rather than here in Castlecrag where the only

means of transport is through heavy traffic is car and bus and somewhat distant from rail. Whilst unaware of the circumstances surrounding the existence of these buildings which seem to be vacant and disused, these buildings have been in their current appearance for a number of years. Why doesn't the developer look at these buildings and seek their development – perhaps opposition to such development will also emerge. Nevertheless, this comparator is important in at least comparing transport and environmental and low cost housing options.

20. A development to conform with this legislative course of housing should comply with its principles and not take advantage of this legislation albeit the proposed project precedes the Government's planning.
21. The question of practicality of the project. As touched up above, the size of the project outgrows any other building both in the immediate area and within at least a 5-kilometer radius from the project. It would appear to fail matters of community involvement, transport, traffic, personal activities, social interaction as well as historical and environmental considerations.

Other

22. Perhaps a minor issue on the one hand, but nevertheless an important consideration in any review of a project, is to review and examine the matter of signage that seeks to illustrate the proposed development. From one perspective, the signage of the proposed project with its billboard picture and attempt to identify with its locality, attracts the view as is the case in this submission, that this project appears quite misleading. The pictures present an image that could be considered as a falsity. It attempts to show the location of the project amongst a scope of bushland, housing and roadways, but where actually is this site? It sets out a picture what is said to be the surrounding area of the project. However, the location of the project in the signage/picture is so poorly depicted. At least at a glance, the photo may have been taken to reflect other harbour and/or Sydney waterway locations – e.g., southern Sydney such as the Warrawee area, the upper northern Sydney waterway of Forestville. In making this brief reference, it is nevertheless accepted that on more than a glance, such a result does not emerge. However, such depiction at a glance, may be seen as a misleading depiction and that in itself could reflect a high level of dishonesty and trust. No excuse or attempt to correct these photos at this point, can alter what may appear to be a falsehood or a misleading presentation. Should this be the case, then it could raise questions regarding trust and goodwill.

CONCLUDING COMMENTS

It is understood that the elements of this submission could be subject to criticism and not agreed with. However, focusing on the respective topics rather than the details of the respective topics should provide a basis for strengthening arguments opposing the Project.

It is accepted that this Project can be considered to be a difficult issue to resolve. Yet, in adopting a pragmatic and realistic approach dealing with the concerns of the community, the geography of the site of the proposed project and dismissing academic and bureaucratic considerations, I submit pragmatic and realistic considerations should be both at the core and progression of the decision making process. References to Government policy concerning low cost housing, while agreed to both in principle and fact, however, in this submission, should not be applied and could not be applied in the case of this Project. Alternative locations addressing this Government approach are more practical than the one under this consideration.

This last point is enhanced by other submissions addressing this particular topic of Government policy, but the sheer outline of 10 units (out of 150 units) to address a principle and/or policy of low cost housing, makes a mockery of this Government approach. How is “affordable” defined in the context of this Project.
