



CASTLECRAg PROGRESS ASSOCIATION INC.

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15 May 2020

EMAIL

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Debra Just
General Manager
Willoughby City Council
PO Box 57
CHATSWOOD NSW 2067

Attention: Ana Vissarian

Dear Ana,

DA-2020/85 3 The Postern

Thank you for allowing CPA to provide its considered response to the above DA for 3 The Postern. This site forms part of the Griffin Heritage Conservation Area and part of the Castlecrag Local Centre. CPA, and other groups, have been actively involved in the planning process for the Local Centre and we consider this proposal to be of major significance to the suburb.

CPA supports, in principle, the redevelopment of the “old squash courts” site. The structure is old and no longer serves the purpose it was built for and, additionally, it does not meaningfully reflect the heritage values of the Conservation Area. Furthermore, CPA supports the idea of “shop-top” housing for the site in the same way that we have for the Quadrangle Project.

However, CPA wishes to register its objection to the application as it stand. We have a number of specific concerns about the proposal that we would like Council to take account of when formulating their report to the Planning Panel:

1. The proposed building wall, along the northern boundary of the site, is inappropriate to its location and inconsistent with Council’s vision for the Local Centre;
2. We do not believe that the current proposal is consistent with the B1 zoning of the site;
3. The proposed building design is inconsistent with the architectural and community values of the Griffin Conservation Area;
4. The proposal, if implemented, will lead to the permanent loss a number of significant trees and will degrade the ambience of the Centre;
5. The proposal exceeds the maximum 9m height limit for the site and the s4.6 argument does not adequately justify this excess.

Each of these points will be discussed more fully in the following sections.

1. Proposed Northern Facade Inappropriate to its Location

The overwhelming problem we see is the proposed northern façade of the development. The images below show the existing building and carpark, viewed from the North-east, and the approximate position and size of the proposed façade.

The northern boundary is the most sensitive dimension of the development. It creates the visual and spatial interface between the south-eastern edge of the village and the Griffin Centre and is prominently visible from Edinburgh Road. It should reflect Griffin design and development principles and should be sympathetically integrated with the streetscape of Edinburgh Road, the heritage-significant Griffin centre and the village ambience generated in the Castlecrag local centre particularly by the large number of significant trees.

The northern boundary, as proposed, is obtrusive, unimaginative and is the very antithesis of what is needed to achieve sensitive and sympathetic integration with the Local Centre and surrounding environment.



View from the North-east showing approximate position and size of the proposed façade.

The wall spurns the heritage and village environment, with which it interfaces, and would significantly sterilise the open space around it.

The inappropriateness of the design for the northern boundary is exacerbated by the following circumstances:

- There is no boundary setback and 5 healthy and mature native trees must be removed from the northern boundary; increases encroachment into the open space adjacent to the Griffin Centre; and precludes the planting of any trees on the northern border to soften and screen the boundary wall;
- Inevitably, it will compromise the visual amenities and ambience of the proposed Postern park;
- The design doesn't exploit the advantages presented by the northern boundary to have its commercial and residential space open to the north, including the northern sun, and the visual amenity of overlooking the proposed park.

2. Not Appropriate to B1 Zoning

WLEP 2012 states that objectives of Zone B1- Neighbourhood Centre are:

- To provide a range of small-scale retail, business and community uses that serve the needs of people who live or work in the surrounding neighbourhood; and
- To minimise the effect of business uses on the amenity of adjacent areas having regard to building design, operation and activities, traffic generation and the car parking capacity of local roads.

The proposal fails to realise the obvious intent of the Neighbourhood Centre B1 zoning, to activate the village area with street level commercial activities. Under B1, residential accommodation is only permitted within the zone as part of “shop-top housing”, meaning “one or more dwellings located above ground floor retail premises or business premises”. CPA submits that the commercial space in the development should be on the northern boundary of the property to maintain connection with, and enhance the vitality of, the commercial activity within the rest of the village centre.

3. Proposal disregards DCP controls for Griffin Conservation Area

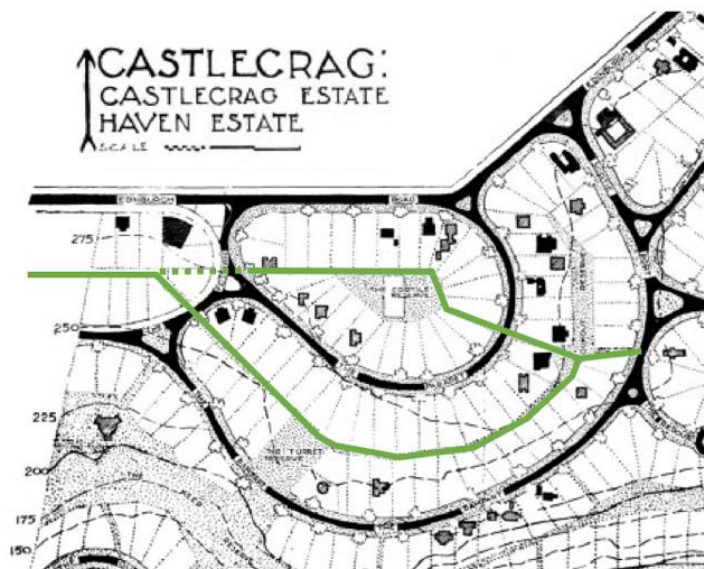
Griffin Conservation Area is special and is explicitly recognised in the WDCP (sH.3.5) stating that the purpose of the controls

“for the Griffin Heritage Conservation Area ... is to conserve the basic principles for the area of which the most significant aspect is the subordination of buildings to the landscape. The aim is to encourage development that upholds these principles by ensuring that new developments respect the predominant scale and form of the Area”

The developer does not appear to have responded to the location of the site in the Griffin Conservation Area at all. The proposal makes no reference to the future of the Griffin Centre, its carpark or the park envisaged in Council's LCS and proposed by the Walter Burley Griffin Society.

The proposed exterior design is dominated by vertical features that run the full 3 storey height around the building. This design is in stark contrast to Griffin's desire for horizontality as can so clearly be seen in the proposed design for the Quadrangle.

Griffin's architectural designs, including those for Canberra, focussed on a walking population with strong links between publicly accessible spaces. Prof. Christopher Vernon of the University of Western Australia put it that "Griffin wanted to provide opportunities for citizens to congregate and get involved in public spaces".



This philosophy is reflected in Castlecrag by its system of Reserves and pathways, planned by Griffin, linking communal spaces like the Griffin Centre to Cortile Reserve to the East, the Turret and Lookout reserves to the Southeast, the Keep reserve to the South as well as Eastern Valley Way to the West. This last pathway forms part of Dr Quek's proposal for the Quadrangle.

The pathways connecting with the local centre are shown in the diagram to the left.

Council's strategy for the local centre explored consideration of connecting the Cortile pathway with the pathway leading to Eastern Valley Way (shown dotted above).

We do not see 3 The Postern as a stand-alone development. It is an essential component of the Castlecrag Local Centre and the Castlecrag community. CPA does not believe that the present proposal meets these aims or is mindful of the Griffin Conservation area, its objectives or how these objectives align with Castlecrag community expectations.

4. Permanent Loss of Significant trees

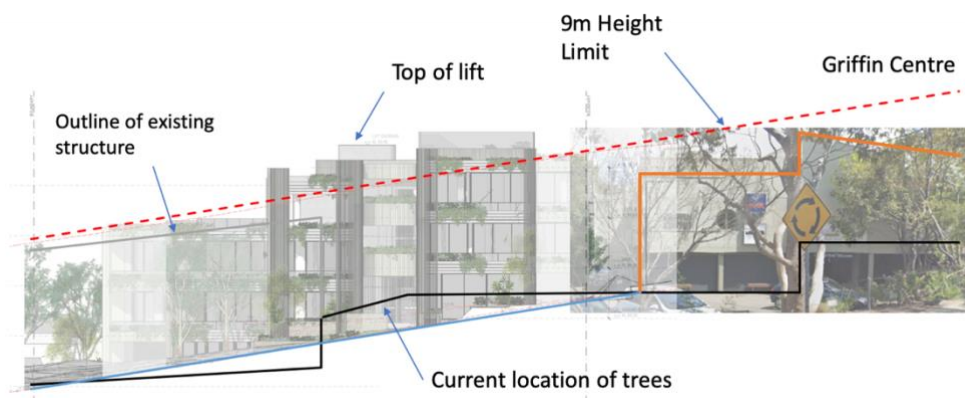
The permanent loss of the 3 angophoras and 2 eucalypts trees on the North side of the current structure is unacceptable. They are an important component of the ambience of the eastern end of the Local Centre and their loss would significantly degrade the ambience of the area. CPA believes consideration should be given to designing the building to wrap around these significant trees.

Dr Quek's Quadrangle proposal has set the "gold standard" for the local trees. He gave an unequivocal undertaking to retain all the existing trees and engaged arborists to check health and dimensions, including root spread, of all the trees.

Trees add value to a property. They are an essential component of Castlecrag's character and, importantly, contribute to our efforts mitigating climate change. Castlecrag, and Willoughby generally, have already lost many trees due to 10/50 fire regulations and recent storms and heatwaves. We can't afford to lose any more.

5. Height limit

The proposed structure exceeds the 9 metre height limit set by the WLEP at the northern and highest part of the site. The proposed structure will dominate the Griffin Centre and should be limited to the allowed maximum height.



The proposed development and the Griffin Centre as seen from the East.

We acknowledge that the applicant has submitted a Clause 4.6 document but we do not believe they have successfully argued that “compliance with the development standard is unreasonable or unnecessary in the circumstances of the case” as required by the WLEP.

The development of 3 The Postern generally (and the northern boundary of that property in particular) is critical to the integrated redevelopment of the Castlecrag village centre. This highlights the importance of completion of Council’s Master Plan for Castlecrag (and respect for the recommendations in the Local Centres Strategy in the meantime). It also highlights the extreme desirability of developers liaising with other stakeholders to ensure that development designs for the Centre are consistent with the integrated development of the village.

CPA believes that an **integrated and consultative approach** is required for developments within the local centre (see Appendix 1). We respectfully suggest that consultation among stakeholders will better support the integration of village development for the benefit of the community as well generating exciting possibilities for stakeholders that might otherwise be missed.

It is unfortunate that the owners of 3 The Postern did not engage with CPA before submitting their DA. We are always open and keen to engage with the developers in connection with the Local Centre. We consider that the consultative approach taken by Dr Quek, in relation to the Quadrangle, including extensive engagement, provides a model for the development process for significant projects in the village centre.

For all of the reasons set out above, CPA objects to the proposal in its current form and we believe that it should not be agreed to without revision. We ask that Council Officers work with the developer to address meaningfully each of the concerns we have raised in a revised DA.

Yours faithfully

Paul Stokes
President
Castlecrag Progress Association
info@castlecrag.org.au

Cc The Mayor, Ward Councillors, WBGS, neighbours of 3 The Postern

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Appendix 1 - An integrative and consultative approach

Willoughby Council and the local community have invested over 2 years of consultation to develop an integrated strategy for our local centre. Additionally, the engagement of many community groups, including CPA and the Walter Burley Griffin Society, with the developer of the Quadrangle site strongly suggests that significant benefits can accrue to both developers and the community through such consultative processes among all stakeholders.

By way of example, possibilities for creative, integrated design in the open space adjacent to the Griffin centre (including 3 The Postern) might include:

- extending the proposed Council park (in the space presently occupied by the council car park) to incorporate the Griffin Centre open car park, either with further green park space or a piazza;
- creating underground parking beneath (and in substitution for) the existing open Griffin Centre carpark.

In addition to adding to community amenities, this would substantially improve both the amenity (and value) of private commercial and residential space designed to open to the north along the northern boundary of 3 The Postern.

CPA is not opposed to development within the local centre as such. We support consideration being given to granting concessions to developers in relation to the strict application of certain development controls, in exchange for exceptional design features (or other forms of community contribution) which significantly enhance the amenities of the community.