

David S Lawson
35 Raeburn Avenue, Castlecrag

Re: Objection to SSD for 100 Edinburgh Road, Castlecrag.

I **object strongly** to the proposed development at 100 Edinburgh Road, Castlecrag. The application seeks approval for a 13-storey mixed-use development comprising two 11-storey towers above a 4-storey podium, which will reach 48.96 metres in height, with 150 apartments, and 376 car spaces. This proposal represents an extreme and unjustified overdevelopment of the site that is entirely out of scale with both the existing planning controls and the established character of Castlecrag.

My primary concern is the **excessive size and scale** of the proposal. The Willoughby Local Environmental Plan 2012 sets a maximum height of 9 metres and an FSR of 1:1. This proposal is 48.96 metres high—**5.4 times the permitted height**—and proposes an FSR of 4.2:1, more than **four times the allowable density**. Even Willoughby Council's own carefully considered 2023 planning proposal supported a much lower uplift (FSR 1.8:1 and modest height increase), yet this scheme more than doubles those limits. The applicant's reliance on a "concurrent rezoning" that has not been approved or exhibited is not a valid justification. This approach attempts to bypass established planning processes and undermines the integrity of the statutory framework.

The **impact on the local community**, particularly in terms of traffic and infrastructure, is also concerning. The intersection of Edinburgh Road and Eastern Valley Way is already operating at **Level of Service F**, meaning it is effectively failing under current conditions. The applicant's own traffic assessment admits that its modelling is "not representative" at this level, meaning the real impacts of adding 150 dwellings cannot be properly quantified. Introducing a development of this scale—with 376 parking spaces and significant retail activity—will inevitably worsen congestion, reduce safety, and place additional strain on already stretched local infrastructure and utilities. Public transport accessibility is limited, with inconsistent bus services, making the assumption of reduced car dependence unrealistic. This proposal imposes a disproportionate burden on the existing community without adequate infrastructure planning.

Equally serious is the **destruction of the Griffin heritage context** and the impact on the adjacent Heritage Conservation Area. The site sits directly on the boundary of the Griffin Heritage Conservation Area and adjacent to the Griffin Centre, a listed heritage item. Castlecrag is internationally recognised as a rare and intact example of the vision of Walter Burley Griffin and Marion Mahony Griffin, defined by low-scale buildings that are subordinate to the natural landscape. The applicant's own heritage report concedes that the site forms a "gateway" to this conservation area and acknowledges "visual contrast due to scale disparity." A 13-storey tower at this location is fundamentally incompatible with the heritage significance of the area. It will dominate the skyline, disrupt important views, overshadow neighbouring properties, and erode the defining principle of buildings harmonising with the landscape. This proposal does not respond to heritage context—it overwhelms it.

For over 100 years the community of Castlecrag have been careful stewards of the built and natural environment that makes this area so unique. I have lived over half my life in this neighbourhood, and passionately value my community as a primary example of what harmonious and considered living could look like now and for the future. I fully support the efforts to modernise this site and invite more residents to join our community. I believe the existing approved development, (one which took our community considerable time and effort to agree democratically) fits this bill.

A development of this massive scale would permanently and significantly alter the character and livability of Castlecrag. Increased traffic congestion, pressure on local services, and the visual and physical intrusion of high-rise buildings would forever destroy the qualities that make this area unique and valued. The proposal prioritises maximum density over thoughtful, context-sensitive and appropriate planning.

To allow this would be to permanently despoil the environmental, social and cultural value and legacy of our internationally recognised suburb, conceived as a residential community where architecture is subordinate to the natural environment – (an area listed on the National Trust Register). This proposal threatens this unique Heritage conservation area, for no significant benefit. It in no way presents architecture that is respectful toward or considered of our natural environment.

For these reasons, I strongly request that the application be **refused**.

I have no reportable political donations to declare.

4 May 2026.