

24 April 2026

The Secretary

NSW Department of Planning, Housing and Infrastructure
Attention: Director, State Significant Development Assessments
4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

Re: Independent Review of Traffic Impact Assessment — SSDA No. 90134958 100 Edinburgh Road, Castlecrag — Conquest Group of Companies

Dear Secretary,

I write to you as a resident of Castlecrag and as a concerned party in the assessment of the above-referenced State Significant Development Application (SSDA No. 90134958). I am submitting this letter to formally place before the consent authority an independent critical review of the Traffic Impact Assessment (TIA) prepared by ptc. and lodged as Appendix Q of the SSDA.

The proposed development at 100 Edinburgh Road comprises 150 residential dwellings and approximately 3,139m² of retail and supermarket floor area at the gateway to the Castlecrag peninsula. The site occupies a particularly sensitive traffic location — the Edinburgh Road / Eastern Valley Way signalised intersection, which the TIA itself acknowledges is currently operating at Level of Service F during the AM peak hour under existing conditions.

Having carefully reviewed the TIA (Issue 6, dated 10 February 2026), I have identified a number of significant methodological deficiencies that, in combination, are likely to materially understate the traffic impacts the development will impose on local residents and road users. These deficiencies are documented in detail in the attached independent review.

In summary, the principal deficiencies identified include:

- The entire existing traffic baseline rests on a single Thursday count (16 October 2025), with no multi-day averaging, no weekend data, and no seasonal variation analysis;
- The PM peak hour identified (3:00–4:00pm) is anomalously early and inconsistent with typical Sydney commuter peak patterns, systematically understating PM peak impacts at the most stressed intersection;
- No Saturday traffic survey has been conducted, despite the proposed development including a supermarket whose peak demand falls on weekends;
- Trip generation for both the retail and residential components is derived entirely from generic, unvalidated formula rates, including application of a 25% linked trip discount drawn from a 2002 guideline with no local empirical support;
- The 75/25 east-west catchment split — which deflects the majority of development traffic away from Edinburgh Road / Eastern Valley Way — is

based solely on a desktop visual analysis with no intercept survey, GPS data, or comparable study to support it;

- Road geometry underpinning the SIDRA model is sourced from undated Google Maps screenshots and 2023 aerial imagery, not from current field survey measurements; and
- Swept path assessments for the supermarket loading dock are acknowledged within the report itself to have been completed without physical ground survey.

Each of these deficiencies is capable of individually reducing the assessed traffic impact. Their cumulative effect is a TIA that cannot be relied upon as a sound basis for development assessment.

I respectfully request that the consent authority direct ptc. to address each of the deficiencies identified in the attached review — including the conduct of a supplementary multi-day and Saturday traffic survey program — before the TIA is accepted as a basis for determining this application.

I would welcome the opportunity to provide further information or clarification to the Department, and am available at the contact details above.

Yours faithfully,

Concerned Resident – Taxpayer

Attachment: Independent Review — Traffic Impact Assessment, Appendix Q, SSDA 90134958 (ptc., Issue 6, 10 February 2026)