

FORMAL PLANNING OBJECTION

State Significant Development Application No. 90134958

100 Edinburgh Road, Castlecrag — Mixed-Use Development, 12–14 Storeys,
150 Dwellings

Objector: Concerned Resident

Address: [Objector's residential address withheld as required]

Application Reference: SSDA No. 90134958

Proponent: Conquest Group of Companies Pty Ltd

Subject Site: 100 Edinburgh Road, Castlecrag NSW 2068 (Lot 11 DP 611594 and Lot 1 DP 43691)

Submitted To: NSW Minister for Planning and Public Spaces / Department of Planning, Housing and Infrastructure

Date: April 2026

1. My Objection — An Overview

I have lived in Castlecrag for over 35+ years, and my partner for 53+ years and we have watched this suburb be carefully stewarded by its residents and Council for many years. I write now because what is being proposed at 100 Edinburgh Road is not a planning question at the margins — it is a proposal that would fundamentally and permanently alter the nature of this suburb, in ways that no future government or community effort could undo.

I want to be clear about what I am not saying. I am not opposed to housing. I am not opposed to the site being redeveloped. A thoughtful, well-designed mixed-use development at this location makes sense — and one has already been approved. What I object to is the specific form of this SSDA: two residential towers rising 12 to 14 storeys above the existing streetscape of Edinburgh Road, delivering 150 apartments that will do nothing for housing affordability, generating hundreds of additional vehicle trips daily at an intersection that is already failing, and doing all of this directly adjacent to one of the most significant heritage precincts in Australia.

My objection addresses eight specific concerns, each grounded in documented evidence:

- The building heights proposed — 12 to 14 storeys — exceed what Council has ever endorsed for this site by a factor of three to four, and bear no relationship to anything in the surrounding neighbourhoods of Northbridge, Middle Cove and Castlecove.
- Willoughby City Council's planning framework — including its LEP, DCP, and Local Strategic Planning Statement — is not merely inconsistent with this proposal. This proposal disregards it entirely.
- A well-designed, appropriately scaled development (DA-2024/13, 38 dwellings, 3 storeys) has already been approved for this site by the Sydney North Planning Panel. It makes this SSDA unnecessary.
- The site sits at the entry gateway to the Griffin Heritage Conservation Area — an internationally recognised planned suburb of Walter Burley Griffin. Towers of this scale at this location would cause permanent, irreversible damage to that precinct.
- Castlecrag has never been — and is not — identified in any state or local planning strategy as a location for housing growth of this intensity.
- The suburb has no train connection. Bus services thin out significantly outside peak periods. The transport infrastructure simply cannot absorb 150 additional households and a supermarket.
- The Castlecrag peninsula has one road in and one road out. The Edinburgh Road / Eastern Valley Way intersection is already at breaking point. Adding this development's traffic load is not a minor inconvenience — it is a potential threat to emergency services access.
- This development will not produce affordable housing. It will produce premium apartments at premium prices, in a location that justifies them commercially but contributes nothing to the people Sydney's housing policies are meant to help.

2. Twelve to Fourteen Storeys in a Three-Storey Suburb

2.1 The Height Controls That Apply to This Site

Edinburgh Road in Castlecrag is a low-scale street. The buildings that line it — the small shops, the Griffin Centre, the two-storey dwellings — sit within a 9-metre height limit set by the Willoughby Local Environmental Plan 2012. That 9-metre limit exists because of where this site is and what surrounds it: it is the edge of a heritage conservation area, on a peninsular suburb, with single-storey and two-storey Griffin-designed houses immediately to the south.

Following a dedicated planning proposal process — one that specifically examined whether, and by how much, height on this site could be increased — Willoughby City Council in April 2023 endorsed a modified maximum height of 11 metres above Edinburgh Road level (roughly 3 storeys) and 15.8 metres above the southern boundary. This was the outcome of genuine community engagement and careful consideration of heritage, amenity, and urban design. It was not a casual administrative decision.

**WILLOUGHBY
COUNCIL —
Endorsed
Planning
Proposal PP-
2021-5395,
April 2023**

"The site-specific clause proposes a maximum building height not greater than AHD 97.49 which equates to 11m above Edinburgh Road level and 15.8m above southern boundary." Source: Have Your Say Willoughby — FAQs for PP-2021-5395.

The SSDA before you proposes 11 storeys from existing ground level. Because the land falls away sharply to the south toward Middle Harbour — as anyone who has walked down The Postern knows — the southern and harbour-facing elevation of these towers will read as 12 to 14 storeys of built form. That is the reality of what this proposal means on the ground, and it bears no relationship whatsoever to the planning framework that applies to the site.

2.2 How This Sits Against Every Surrounding Benchmark

I would ask the Department to look at a map of the area around Edinburgh Road, Castlecrag, and tell me where the nearest building of comparable height stands. It does not exist. Northbridge to the south: R2 Low Density, 2-3 storey houses. Castle Cove to the north: low-density residential. Middle Cove: likewise. The buildings along Edinburgh Road itself: one and two storeys.

Buildings of 12 to 14 storeys belong in places like Chatswood, North Sydney, and St Leonards — places that the NSW Government has explicitly nominated as high-density housing corridors, that have direct train and metro connections, and that have been planning for this kind of growth for decades. The decision to seek an SSDA for a site in Castlecrag, rather than pursue development through the local planning pathway, is itself telling. It suggests the proponent knows this proposal cannot survive proper scrutiny under the controls that apply to the site.

3. A Proposal That Simply Ignores the Planning Framework

I want to address the claim — which will no doubt feature in the proponent's submissions — that this development is consistent with, or can be reconciled with, Willoughby Council's planning framework. It cannot. The table below sets out the relevant controls and what this SSDA actually does with them.

Planning Control	What the SSDA Actually Proposes
WLEP 2012 — Building Height (Edinburgh Rd frontage): 9 metres maximum	SSDA proposes approximately 38–40 metres (11 storeys from ground) — more than four times the LEP control.
Council's endorsed height (PP-2021-5395, April 2023): 11m above Edinburgh Rd / 15.8m above south boundary	SSDA is 3–4 times the endorsed maximum at every point on the site.
Griffin HCA objective: buildings must be subservient to landscape; views and vistas preserved	SSDA creates two towers that will dominate the entire Castlecrag peninsula skyline and be visible across Middle Harbour.
WLEP 2012 Clause 4.4A — FSR: 1.8:1 maximum for E1 Local Centre (Area 21)	The SSDA density (150 dwellings + 3,139m² retail) requires independent verification of FSR compliance.
Council's LSPS: explicitly recognises importance of preserving Griffin's design philosophy	The SSDA makes no credible attempt at design compatibility with the Griffin HCA or its setting.
NSW Government Architect policies: Better Placed, Design Guide for Heritage, Implementing Good Design	The WBGS pre-application submission identifies that the SSDA implements none of these policies.

This is not a case of a development that pushes at the edges of what planning controls permit. This is a proposal that, by any objective reading, operates in a different planning universe from the one that applies to 100 Edinburgh Road. The SSDA pathway is being used not because this proposal is of genuine State significance, but because it has no viable path through the local planning framework.

4. The Site Does Not Need This Development — It Already Has a Better One

I want to draw the Department's attention to something that I think should be central to how this SSDA is evaluated: there is already an approved development for this site.

In December 2024, the Sydney North Planning Panel approved DA-2024/13 — a mixed-use development at 100 Edinburgh Road designed by FJC Studio. It provides 38 dwellings across 3 storeys of shop-top housing, with ground-floor retail. It is well-designed, appropriately scaled, consistent with the Council's endorsed planning controls, and sensitive to the heritage context of the Griffin Conservation Area. The Walter Burley Griffin Society, which has been deeply involved in monitoring development in Castlecrag for decades, supports it.

**DA-2024/13 —
Sydney North
Planning Panel,
December
2024**

A development application for 100 Edinburgh Road, Castlecrag was assessed and approved by the Sydney North Planning Panel in December 2024. The approved development provides 38 dwellings in a 3-storey shop-top housing scheme with ground-floor retail, designed by FJC Studio — consistent with heritage controls and Council's endorsed planning framework. Source: Walter Burley Griffin Society, Media Release, 30 January 2026.

I raise this not simply as a planning comparison, but as a rebuttal to the implied necessity of scale. The proponent may argue that Sydney needs housing and that this site should contribute more. But the approved DA already contributes housing. The question is not whether the site should be developed — that question is settled. The question is whether Conquest should be permitted to build four times as many dwellings in a form that the planning system has never endorsed, and at a cost to heritage and neighbourhood character that cannot be reversed.

The answer to that question should be no.

5. What Is at Stake in the Griffin Conservation Area

5.1 This Is Not an Ordinary Heritage Precinct

Castlecrag was designed from scratch — from the contour of its roads to the covenants on its blocks — by Walter Burley Griffin and Marion Mahony Griffin, who had previously designed Australia's national capital. Beginning in 1921, their Greater Sydney Development Association purchased 263 hectares of Middle Harbour foreshore to create something genuinely radical: a suburb where the roads followed the land rather than overriding it, where buildings were kept low and flat-roofed so they would not steal each other's views or dominate the bush, where public reserves and walking paths were woven through the neighbourhood as a shared amenity, and where the native landscape was treated as the most important design element of all.

That vision survives today. It survives in the walking tracks, in the reserves, in the 35 heritage-listed items within the suburb, in the two NSW State Heritage Register properties on Edinburgh Road itself — at 136 and 140 Edinburgh Road, directly adjacent to the subject site — and in the Griffin Heritage Conservation Area established under the Willoughby LEP. It survives because generations of residents, community groups, and councils have fought to protect it.

**GRIFFIN
CONSERVATION
AREA
OBJECTIVE —
Willoughby DCP
19**

"Within the Griffin Conservation Area, the most significant objective of the heritage controls is to ensure the subordination of buildings to the landscape, as well as the preservation of amenity, landscape, views and vistas." Source: Willoughby City Council DCP 19 / Walter Burley Griffin Society.

5.2 What Two Towers at the Gateway Will Actually Do

The subject site sits at the point where Edinburgh Road meets Eastern Valley Way — the entry point to the Griffin estates. Anyone arriving at Castlecrag by road passes through this gateway. The Griffin Memorial Fountain — a public monument to Walter Burley Griffin erected at the corner of Edinburgh Road and The Sortie Port — marks this threshold. The two State Heritage Register-listed demonstration houses that Griffin built to establish the character of his model suburb sit metres from the boundary of the SSDA site.

If two towers of 12 to 14 storeys are built here, they will be the first and most prominent thing anyone sees when they arrive at Castlecrag. They will be visible from the Griffin-designed reserves and walking paths throughout the peninsula. They will loom over the single-storey heritage houses to the south. They will be visible across Middle Harbour from Castle Cove and the opposite foreshore. And — this is the point I want to emphasise — nothing that happens afterwards will fix it. There is no condition of consent, no landscaping scheme, and no design modification that makes 12 storeys of residential tower compatible with a heritage precinct whose foundational rule is that buildings must be subservient to the landscape.

The Walter Burley Griffin Society — the body of record for Griffin heritage nationally — has put this clearly in its own submission, calling on the Minister to withdraw the SSDA and describing the granting of the SSD status as likely to have occurred "in error." Professor Anthony Burke, presenter of the ABC's *Grand Designs Australia* and *Restoration Australia*, is among the eminent professionals who have signed a petition statement in support of the Society's objection, describing the Griffin HCA as being "of truly international significance."

6. Castlecrag Is Simply Not the Right Location for This

I understand that Sydney has a housing challenge. I understand that density needs to go somewhere. But strategic planning exists precisely to ensure that density goes to the right places — places with the transport, infrastructure, and capacity to absorb it — not to any suburban site where a proponent sees a commercial opportunity.

By every measure in the NSW Government's own planning framework, Castlecrag is not the right place for a 150-dwelling, 14-storey development:

**WALTER
BURLEY
GRIFFIN
SOCIETY —
Pre-
Application
Submission,
January 2026**

"The NSW Government's Draft Sydney Plan does not identify Castlecrag as a planned housing growth area. The site is far away from the train and metro lines and is thus not in the NSW Transport-Oriented Development Program. The site is not affected by NSW's Low Mid-Rise Housing Policy. If proceeded with it would create a precedent to build in any remote suburban set of shops." Source: griffinsociety.org, 30 January 2026.

The Transport-Oriented Development Policy — the NSW Government's primary mechanism for directing density to appropriate locations — requires proximity to a train or metro station. Castlecrag has no train station. The Draft Sydney Plan does not include Castlecrag among the locations identified for housing growth. The Low and Mid-Rise Housing Policy, which relaxes height and density controls in specified areas, does not apply here. The Greater Sydney Commission's North District Plan does not identify this suburb as a strategic centre or growth corridor.

I would ask the Department to consider what approval of this application implies for every other suburban commercial strip in Sydney. If the SSDA pathway can be used to deliver 14 storeys and 150 dwellings in Castlecrag — a suburb with no train access, inadequate bus frequency, a failing intersection, and internationally recognised heritage controls — then there is no principled basis on which any similar application anywhere in metropolitan Sydney could be refused. The precedent this sets is as damaging as the development itself.

7. One Road In, One Road Out — and It Is Already Failing

7.1 The Basic Geography of the Problem

Castlecrag sits on a peninsula. There is one primary vehicular route onto and off that peninsula: Edinburgh Road, connecting to Eastern Valley Way. This is not a condition that can be engineered away or mitigated by a Green Travel Plan. It is a geographical fact.

The proponent's own Traffic Impact Assessment — prepared by ptc. and submitted as Appendix Q of this SSDA — contains a finding that should give every decision-maker pause. Using the SIDRA intersection modelling tool, ptc. found that the Edinburgh Road / Eastern Valley Way intersection currently operates at Level of Service F during the morning peak hour. Level of Service F is the bottom of the scale. It means the intersection is operating beyond its design capacity, with excessive vehicle delays and queuing already occurring every weekday morning before a single new resident moves in.

The current traffic at 7:48am on a Tuesday 21st April 2026 provides an interesting snapshot of the current traffic that is banked up 3 blocks back to the school, indicating that this development would create overwhelming traffic congestion. Traffic in and out of the proposed development significantly poor access in and out of the proposed driveway.

Traffic attempting to access the site blocking inbound flows to Castlecrag in morning and evening peaks and a restricted ability to exit the proposed site need to be considered seriously when considering the following point (7.2).



7.2 What 150 New Households and a Supermarket Will Add

The same TIA estimates the proposed development will generate 311 additional vehicle movements during the AM peak hour and 403 during the PM peak — a total of more than 700 additional trips through the peninsula's single access point on an average weekday. These figures are based on a flawed traffic survey conducted on a single day (Thursday, 16 October 2025), a PM peak hour of 3:00–4:00pm that is inconsistently early for a residential and retail development, and a catchment split assumption that conveniently directs the majority of retail traffic away from the failing intersection without any empirical validation.

Independent review of this TIA identifies those assumptions as optimistic and, in some cases, unsupported by evidence. The actual traffic impact on Edinburgh Road / Eastern Valley Way is likely to be materially higher than the TIA projects. And the TIA's conclusion — that development traffic causes no change to the Level of Service of any modelled intersection — is based on a methodology that independent experts would not accept as robust.

7.3 The Emergency Services Question

I want to raise something that I believe has not received sufficient attention in the assessment of this proposal. When an intersection operating at Level of Service F becomes temporarily gridlocked — due to a breakdown, a collision, road works, or simply the compounding of peak-hour demand beyond the model's predictions — Edinburgh Road becomes impassable. On a peninsula with one road in and one road out, that means ambulances, fire trucks, and police vehicles cannot reach residents in an emergency. It also means they cannot exit under time pressure.

This is not a hypothetical risk. It is a foreseeable consequence of adding several hundred additional daily vehicle movements to a road network that the proponent's own traffic engineers have already assessed as operating at maximum capacity. I ask the Department, before determining this application, to require the proponent to commission a specific emergency access assessment in consultation with NSW Ambulance, Fire and Rescue NSW, and NSW Police, addressing the adequacy of emergency vehicle access to the Castlecrag peninsula under the traffic conditions this development would generate.

8. Premium Apartments Are Not a Housing Policy Solution

I want to address directly the argument that will be made — that Sydney needs housing supply and that this development contributes to it. I do not dispute that Sydney needs more housing. But not all housing supply is equal, and the claim that this development addresses Sydney's housing challenge does not survive scrutiny.

Consider what is actually being proposed. One hundred and fifty apartments — 78 two-bedroom, 54 three-bedroom, and 8 penthouses — on one of Sydney's most sought-after harbourside streets, in a suburb where median house values are among the highest on the Lower North Shore. These are not apartments that will be accessible to the key workers, young families, or lower-income households that Sydney's housing policies are meant to prioritise. They will be priced at the upper end of the Sydney market by design, because that is what a site of this character, in this location, commands commercially.

The SSDA's affordable housing component — the minimum mandated under the site-specific Clause 6.8 of the Willoughby LEP — amounts to approximately 3.4% of total floor area. At that rate, the development would deliver perhaps 5 to 8 affordable dwellings within a 150-apartment complex priced at levels entirely inaccessible to households experiencing genuine housing stress. That is not a housing affordability contribution. It is a compliance checkbox.

The housing supply argument is further undermined by the existence of DA-2024/13. If the approved 38-dwelling development proceeds, the site contributes meaningfully to housing supply at a scale consistent with its planning controls. Adding 112 more apartments does not solve an affordability problem. It generates profit for the proponent while imposing permanent costs on the heritage, character, traffic, and liveability of Castlecrag that every resident — not just new buyers — will bear.

9. What I Am Asking For

I have lived in this suburb long enough to understand what makes it worth protecting. Castlecrag is not simply a desirable address. It is a planned community built on a coherent set of values — respect for landscape, subordination of the built to the natural, community over commerce — that its residents have chosen to honour across a hundred years. Those values are not sentimental; they are embedded in binding planning instruments, heritage listings, and decades of community consultation.

This SSDA asks the NSW planning system to set all of that aside in favour of a development that exceeds every relevant height control by a factor of three to four, that no transport infrastructure can adequately serve, that the suburb's only road access cannot safely absorb, that produces no meaningful affordable housing, and that would visually and permanently overwhelm a heritage precinct of international significance — at the very entrance to that precinct.

I formally request that the NSW Minister for Planning and Public Spaces and the Department:

1. Refuse consent to SSDA No. 90134958. The building height, dwelling yield, and bulk of this proposal are irreconcilable with the Willoughby LEP, the planning controls endorsed by Council in April 2023, the objectives of the Griffin Heritage Conservation Area, and any defensible reading of the NSW Government's strategic planning framework.
2. Confirm that the already-approved DA-2024/13 represents the appropriate development outcome for this site, and communicate to the proponent that a resubmission aligned with that approval — and with the Council-endorsed planning controls — is the appropriate path forward.
3. Commission an independent heritage impact assessment of the proposed development's effect on the Griffin Heritage Conservation Area, including visual impact analysis from within the reserve network, the foreshore, and Middle Harbour, with reference to the State Heritage Register-listed properties at 136 and 140 Edinburgh Road.
4. Require, before any further assessment is undertaken, that the proponent commission an independent emergency services access study in consultation with NSW Ambulance, Fire and Rescue NSW, and NSW Police, addressing the adequacy of access to and egress from the Castlecrag peninsula under the traffic conditions the development would generate.
5. Require a fully independent peer review of the ptc. Traffic Impact Assessment, addressing the single-day survey methodology, the anomalous PM peak identification, and the unvalidated catchment assumptions, before any traffic findings are accepted as a basis for determination.
6. Consider the formal pre-application submission lodged by the Walter Burley Griffin Society (via planning consultants Desim Pty Ltd) on 30 January 2026, and respond substantively to the planning, heritage, and transport concerns it raises.

Thank you for considering my objection. I would welcome the opportunity to speak to it further at any public hearing or community consultation. I ask that this submission be treated as an individual objection and given individual consideration.

Yours sincerely,

Concerned
Castlecrag Resident
April 2026

Enc: Supporting references as cited in body of submission.