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3 May 2026

The Secretary
NSW Department of Planning, Housing and Infrastructure
GPO Box 39
Sydney NSW 2001

Re: Objection to State Significant Development Application — 100 Edinburgh Road, Castlecrag NSW 2068

Dear Secretary,

I write as a property owner in the vicinity of 100 Edinburgh Road, Castlecrag, to formally object to the above State Significant Development application. Having reviewed the Environmental Impact Statement and supporting documentation, I hold serious concerns across a number of planning, environmental, heritage, and community dimensions. I respectfully urge the Department to refuse this application in its current form.

1. Planning Non-Compliance and Strategic Misalignment

The proposal is fundamentally at odds with the E1 Local Centre zoning that applies to this site. That zone is expressly intended to accommodate small-scale, village-based mixed use development — not high-rise intensification of the kind proposed here. The EIS appears to import planning logic applicable to designated growth centres such as Northbridge, yet this site carries no such designation and is not eligible for the associated height or density bonuses that reasoning would imply.

There is also no credible Transit Oriented Development basis for the proposal. The site has no rail or metro connection, and bus services are limited and infrequent. Concentrating this level of density at a location without meaningful public transport access is contrary to sound planning practice. The proposed height exceeds even the limits applicable to the nearby Northbridge Town Centre — a higher-order centre — which makes the proposal entirely disproportionate for Castlecrag.

I also note that the Design Review Panel has identified unresolved design issues relating to bulk, massing, street interface, heritage response, and overshadowing. These are not minor matters. The claim of design excellence is, in my view, unsupported.

2. Setbacks, Building Separation and Built Form

I am concerned that setbacks in the EIS have been measured from land outside the site boundary, which artificially inflates apparent compliance. The setback relationships retained in this proposal appear to have been carried across from an earlier 3–5 storey scheme without adjustment for the significant increase in height to

over 11 storeys. This is not consistent with accepted planning principles, which require setbacks to scale with building height.

The result is an abrupt and unmediated transition between the proposed high-rise form and the surrounding low-rise residential context. There is no graduated scale response, and the non-compliance is not confined to isolated elements — it appears to occur throughout the full height of the building.

3. Heritage Impact

Castlecrag is a heritage-sensitive environment shaped by the enduring influence of Walter Burley Griffin's planning philosophy. The proposed development represents a fundamental departure from that character. Rather than providing a low-scale and landscape-integrated gateway to the conservation area, the proposal introduces a dominant vertical structure that would overwhelm the visual and spatial integrity of its surroundings.

The EIS, in my assessment, does not engage with heritage impacts with the rigour they demand. The proposed height significantly exceeds previously accepted benchmarks for this location, and the treatment of heritage considerations in the documentation appears cursory rather than substantive.

4. Traffic, Parking and Infrastructure

The proposal more than doubles the number of parking spaces (from 163 to 376), yet the traffic assessment claims reduced vehicle impacts — a conclusion that appears difficult to reconcile with both the increased density and the acknowledged limitations of public transport access to this location. The surrounding road network is already operating under congested conditions during peak periods, and no meaningful mitigation is proposed.

There is a real risk that additional traffic will divert through local residential streets that are not designed for higher volumes. Pedestrian safety, particularly near shops, schools, and pedestrian crossings, is a further concern that has not been adequately addressed.

5. Public Transport Limitations

The EIS overstates the accessibility of this site by public transport in a manner that materially undermines the planning justification for the proposed density. The nearest rail stations are located approximately 3–4 kilometres away, making them an impractical option for the majority of future residents on a day-to-day basis. The site is therefore not genuinely well-served by the rail network, and it cannot reasonably be characterised as having strong public transport access.

Bus services provide the only realistic alternative, yet frequency is limited — particularly outside weekday peak hours. Residents without private vehicles would face significant practical constraints, and the logical consequence is that the development will be heavily car-dependent. This is reflected in the substantial parking provision proposed, which sits in direct tension with any claim that the site is transit-accessible.

What makes this more concerning is that the project's own construction planning documentation appears to acknowledge the site's poor transport connectivity — a frank admission that sits in direct contradiction with the planning justification put forward elsewhere in the EIS. A development of this scale and density ought to be located where genuine, frequent, and multi-modal public transport exists. That condition is simply not met here.

6. Affordable Housing and Community Benefit

The proposal offers only 6.67% affordable housing — below policy expectations. Given that the scheme is positioned as a high-end market development, it is unlikely that even the discounted units would be accessible to low-to-moderate income earners at prevailing local rent levels. The development therefore makes no meaningful contribution to addressing housing affordability or the shortage of options for first home buyers.

I also note that community facilities previously included in an earlier iteration of the scheme have been removed. The public areas that remain appear to serve primarily as retail circulation space, with limited genuine community benefit. This is a step backwards from what the village character of Castlecrag both needs and deserves.

7. Community Consultation

The consultation process does not, in my view, meet the standard expected for a proposal of this scale and impact. Engagement was limited in scope, presentation materials were not readily interpretable by the general public, and — most significantly — the proponent has acknowledged it was not prepared to modify its proposal in response to community feedback. This renders the consultation process a procedural exercise rather than a genuine opportunity for the community to influence the outcome.

Conclusion

Taken together, the concerns outlined above represent a pattern of non-compliance, inadequate assessment, and a failure to respect the character and planning intent of Castlecrag. The proposal, as submitted, is not appropriate for this location.

As a nearby property owner, I have a direct interest in ensuring that development in this area is considered, contextually appropriate, and properly assessed. I respectfully urge the Department to refuse this application, and I request that this submission be formally recorded and given due weight in the assessment process.

Yours faithfully,

A handwritten signature in black ink, appearing to be 'Matthew Brown', written in a cursive style.

Matthew Brown