

OBJECTION

State Significant Development Application No. SSD-90134958

100 Edinburgh Road, Castlecrag NSW 2068

Christine Bowen

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Long-term resident of Willoughby • Family of Forsyth & Fleming families, early settlers in the WCC area.

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1. I object to SSD-90134958

I object to this SSD proposal. Based on the publicly available SSD assessment materials (including the EIS, the Design Review Panel Design Advice Letters, and the NSW design review framework), the proposal has not demonstrated an acceptable level of **design excellence** and **heritage-sensitive outcomes**, particularly given the site's cultural and place-based significance.

My concerns are primarily:

- the **impact on the Burley Griffin heritage area** (including the Griffin Heritage Conservation Area and the Griffin Centre / Griffin legacy context);
- the **size and form** of the development: **two 11-storey towers with 150 apartments** (height, bulk, scale, and the resulting urban and neighbourhood impacts);
- the proposal's **housing mix/affordability fit** with community needs; and
- the State Architect's/design excellence advice is clear that the proposal has **not yet reached the standard** required and **needs major changes**.

2. Heritage impacts: the design does not yet meet the level of sensitivity required for the Burley Griffin / Griffin legacy context

The site is **adjacent to the Griffin Heritage Conservation Area** and located within a sensitive cultural landscape linked to the work and legacy of **Walter Burley Griffin and Marion Mahony Griffin**. In such cases, the SSD pathway still requires the consent authority to be convinced that the development will deliver **skilled, compatible, and appropriately executed** heritage and urban design outcomes.

However, the publicly available Design Review Panel advice highlights ongoing concerns in precisely these areas, including:

- **height and massing in relation to heritage and context;**
- **visual impact and overshadowing** from surrounding viewpoints; and
- the need for responses to demonstrate appropriate mitigation and design adjustments that genuinely protect the heritage significance and setting.

The EIS attempts to justify acceptability through materials, setbacks, and general statements of moderation. In my view, this is not enough for a Burley Griffin legacy site, where the planning and design standards focus on **outcome-based compatibility** rather than merely the use of "appropriate-looking finishes." The proposal's **scale change**—compared to what is currently approved and expected in the area—introduces a setting risk that has not been fully addressed to the level required for design excellence.

Objection ground: the proposal has not been demonstrated to achieve the heritage-sensitive outcome required by the SSD design excellence framework, and therefore should be refused or require a major redesign before approval.

3. Scale and built form: two 11-storey towers with 150 apartments are a major intensification with insufficiently resolved height/bulk/visual dominance impacts

The proposal is not a modest upgrade from the proposal already approved. It is a major built form outcome:

- **two 11-storey residential envelopes/towers**
- **150 apartments** (including affordable housing)
- overall height up to approximately **48.96m**

The Design Review Panel's main concerns include **massing relationships, height in context, overshadowing**, and **visual impacts** from **Eastern Valley Way, Edinburgh Road, and the surrounding areas**. These are not "presentation preferences." They are fundamental amenity and site-compatibility issues.

Although the EIS and design review record discuss mitigation measures, the extensive height, bulk, and tower massing mean that acceptance of impacts must be demonstrated as a **final, robust outcome**. The design review record indicates that the proposal still requires further development to address these concerns, including lowering or adjusting the bases and improving massing and transitions.

Objection ground: the proposal's height and bulk are excessive relative to the heritage-adjacent, low-to-medium residential character edge and the Burley Griffin legacy setting, and the development has not yet achieved the design excellence standard required to justify that form.

4. Housing mix/community needs: it does not deliver a housing mix that adequately reflects community needs

The applicant frames the proposal as addressing housing supply and affordability. However, housing need is not only about housing numbers—it is about **housing mix, long-term affordability, and matching what local communities actually need**, particularly in areas where neighbouring housing stock is predominantly low-scale and where community amenity is a primary planning consideration.

The proposal includes affordable dwellings, but:

- the overall scheme remains dominated by high-rise form and massing; and
- the balance of apartment sizes and outcomes is not evidenced as a meaningful match to the broader community housing needs for this specific locality, beyond general statements of diversity.

In my opinion, housing objectives cannot justify a design that has unresolved heritage, amenity, and neighbourhood compatibility issues.

Objection ground: the proposal has not demonstrated that it delivers the kind of community housing outcomes—beyond yield—that properly justify the scale, height, and heritage setting impacts.

5. State Architect/design excellence: the proposal does not meet the design excellence standard and needs major changes

The NSW design review framework, including the State Architect/design excellence pathway, is intended to ensure that projects—especially those in sensitive locations—achieve high standards of design quality and amenity outcomes.

The State Architect's design excellence advice (as reflected in the design review record and process) indicates that the proposal has not yet met the **standards of design and excellence** and therefore requires **significant changes** before it can be deemed suitable.

Accordingly, I submit that the SSD should not proceed to approval in its current form.

6. Relief sought

I request that the consent authority:

1. **Refuse** SSD-90134958 in its current form; and/or
2. If the Department/consent authority considers the matter capable of approval, require a **major redesign** that:
 - substantially reduces the visual and heritage setting impacts of the towers (including height, massing, transition, overshadowing, and visual dominance outcomes);
 - closes the remaining design excellence gaps identified through the Design Review Panel process;
 - demonstrates a housing outcome (including mix and affordability delivery arrangements) that genuinely supports community needs, not only housing yield; and
 - offers decision-ready, evidence-based results instead of depending on future improvements.

7. Conclusion

For the reasons outlined above—particularly the unresolved Burley Griffin / Griffin heritage setting impacts, the excessive height and bulk of two 11-storey towers with 150 apartments, and the proposal's lack of demonstrated design excellence—I object to the SSD.