OBJECTION

State Significant Development Application SSD-90134958

Mixed-Use Development — 100 Edinburgh Road, Castlecrag

Grounds of Objection: Planning Policy and Process

I write as a 50+year resident of the Rampart, Castlecrag to object to this State Significant Development application in the strongest terms. The proposal for twin towers of up to 13 storeys at the gateway to Castlecrag would cause irreversible harm to the Walter Burley Griffin Heritage Conservation Area (Griffin HCA) and should be refused.

Other submissions will detail the heritage and traffic issues and I share those concerns. Below, I wish to focus to the misuse of the Housing Delivery Authority (HDA) pathway.

Castlecrag Is Not Identified for This Scale of Growth

The Draft Sydney Plan does not identify Castlecrag as a planned housing growth area. The site is not in the NSW Transport-Oriented Development (TOD) Program. The site is not affected by the NSW Low and Mid-Rise Housing Policy. The nearest train station (Artarmon) is approximately 2.5 km away; the nearest metro station is approximately 4 km away. The site is served only by bus.

Every strategic planning instrument produced by the NSW Government points away from this site as a location for high-density development. The proposal is inconsistent with the Willoughby City Council Local Strategic Planning Statement (LSPS), which emphasises the importance of preserving Griffin's design philosophy and managing growth at a scale appropriate to local centres.

The HDA Pathway Is Being Misused

The HDA was established to accelerate well-located, affordable housing delivery — not to enable private equity developers to quadruple the yield of an already-approved scheme at a site poorly connected to mass transit. Conquest purchased this site in May 2025 for approximately $69 million with an existing DA approval for 38 apartments, then immediately sought SSD status to expand to 150 apartments.

The Premier himself stated the HDA was about housing "close to transport, amenities and services" for "young people." A luxury twin-tower development 4 km from the nearest metro station does not meet this description. Of the 150 apartments, only 10 (6.7%) are designated "affordable." The remaining 140 are luxury apartments marketed to high-end purchasers. This is not the housing the HDA was created to deliver.

A Dangerous Precedent

An approved development already exists. DA-2024/13, approved by the Sydney North Planning Panel in December 2024 after years of community consultation, provides 38 apartments plus retail including a supermarket. If the Department permits developers to immediately seek SSD status to override locally-approved DAs, no community in NSW can have confidence in the development assessment process.

This sets a dangerous precedent: any developer could purchase a site with an approved DA and immediately seek to bypass council oversight via the HDA. Every community-consulted approval in the state would be at risk.

The Proposal Massively Exceeds Development Standards

The HDA's own EOI criteria require that proposals "not exceed applicable development standards by more than 20%." The approved LEP height controls for this site contemplate a maximum of approximately 3–5 storeys. A 13-storey proposal exceeds this by several hundred percent. This means a concurrent rezoning with demonstrated strategic merit is required — and strategic merit cannot be established when no strategic plan identifies this site for growth.

Request

I urge the Department to refuse this application and uphold the integrity of its own planning framework. The proposal is inconsistent with every relevant strategic planning instrument, misuses the HDA pathway, and sets a precedent that would undermine community confidence in the planning system across NSW.

Redacted

The Rampart, Castlecrag