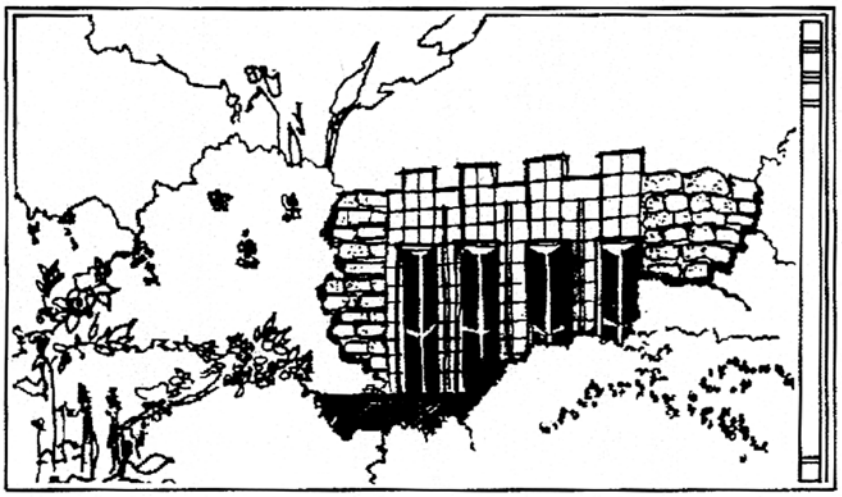
WALTER BURLEY GRIFFIN SOCIETY INCORPORATED



23 October 2026

Keiran Thomas
Director – Housing Delivery Assessments
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150
c/- Fiona Dowler, HDA, fiona.dowler@dpie.nsw.gov.au

Dear Mr Thomas,

SSD-90134958 at No. 100 Edinburgh Road, Castlecrag.

The Walter Burley Griffin Society is extremely disappointed and greatly concerned that the Statement of Heritage Impact accompanying the Revised SSD-90134958, and the Design Review Panel 3 dated 14 September 2026 are both severely deficient in analysis and documentation of the heritage impact that this proposed Revised SSD would have on the internationally important Griffin Heritage Conservation Area (Griffin HCA).

Listed below are some of these deficiencies and the resulting false and misleading statements.

Addendum Statement of Heritage Impact (SoHI) prepared by Weir Phillips Heritage to accompany the consolidated Response to Submissions and RFI for SSD-90134958.

The SoHI states that it "*assesses the heritage and visual implications of that revised design*". Curiously it then states: *Under the Low and Mid-Rise Housing provisions in Chapter 6, residential flat buildings and shop-top housing on land within the walking catchment of a nominated town centre are permitted to a maximum height of 24m and up to six storeys. …. Assessed against that future context, the scale disparity between the development and the Conservation Area, while still present, is materially reduced, and the residual visual and scale impact of the revised proposal on the Griffin Heritage Conservation Area is, on balance, considered acceptable* (p.4).

This is seriously misleading, as Castlecrag is not identified as a town centre. The neighbouring suburb of Northbridge is identified as a town centre but is more than 800 metres away and 100 Edinburgh Road is thus not within the walking catchment.

Also misleading is the implication of the report's statement that zoning of Low and Mid-Rise Housing that permits up to six storeys would legitimise in some way the 11 / 12 storey proposal that would be twice the height.

Another misleading claim is that assessment ought to be made against "*emerging and future character"* (p.4) without revealing that the maximum height of dwellings in the Griffin Heritage Conservation Area (Griffin HCA) is two storeys and that the Willoughby City Council Local Centres Strategy 2036 appropriately has a maximum of three storeys for the area zoned non-residential at Castlecrag.

Also misleadingly, the SoHI does not reveal that it would be the precedent created by this Revised SSD, were it to be approved, that would create an appalling precedent, over-ruling the well-informed and wise planning of the Willoughby City Council, and opening the door to potentially an influx of unsympathetic over-scaled development.

The SoHI falsely states that the revised SSD has a mitigation measure of "*retention of existing mature vegetation*" (p.4). It is clear from the EIS plans (Ground Floor Demolition Plan) (EIS p.6) that 12 healthy mature trees would be removed by the Revised SSD plans if they were approved, resulting in disastrous impacts on the landscape. Page 6 from the Revised SSD plans clearly show that 12 trees on the southern boundary with the Griffin HCA are proposed to be removed - these 12 trees are all Australian native trees including an Angophora Costata of 22 metres, four Tallowwoods of 24 metres and a Eucalyptus botryoides of 20 metres.

The basement carpark (EIS p.7) proposed at the boundary with the Griffin HCA would, if approved, necessitate the removal of these 12 magnificent trees that are the only landscape and visual buffer between the Griffin HCA and the proposed Revised SSD. Despite hundreds of submissions objecting to the removal of these trees at the southern boundary of the site adjacent to the Griffin Conservation Area in the SSD plans of May 2026, the Revised SSD still proposes its 5 level basement carpark right under the trunks of these magnificent trees.

PHOTO of Griffin HCA with trees behind houses at 7, 9 and 11 The Postern. Trees outlined in orange would be removed, necessitated by the basement carpark as shown in EIS pp.7–14 with excavation for basements 1 to 4, lower ground floor, and also the podium which has non-compliant setback to the southern boundary.

The SoHI also misleads by stating the "*Visual Impact Assessment has been revised to consider additional viewpoints, including locations … to the south and south-east*" (p.4). The Visual Impact Assessment by Urbaine Design Group dated 22 September 2026 on the NSW Planning Portal has four or five views all from Eastern Valley Way which is the main road connecting Northbridge to Castlecrag. There are no views taken from the Griffin HCA to the south and south east of the proposed Revised SSD.

The SoHI then states that the "*reduced building envelope lessens the visual prominence of the development from these viewpoints and reduces the extent to which the built form is read above the tree line on approach to the Conservation Area*".

Sadly, this statement is also very misleading as the 11/12 storey revised proposal would still be more than twice the height of the tallest trees (many of which are proposed to be removed) at the site, and would tower over the Griffin HCA. In no way can the proposed Revised SSD be considered "subordinate to the natural landscape", as appropriately requested by the DPHI in its RFI. The subordination of the built form to the natural landscape is the underlying principle of the Griffins' visionary approach to the suburb's unique plan that is internationally renowned.

The SoHI's conclusion restates many of these false and misleading statements and finally concludes that the Revised SSD's "*impact is considered acceptable … and continues to respect the heritage significance of the Griffin Heritage Conservation Area and the items in the vicinity*". This statement is false and extremely misleading and demonstrates a complete lack of understanding of the Griffin legacy and Castlecrag's urban morphology that is unique in Australia. The site at 100 Edinburgh Road is at the gateway to the Griffins' Castlecrag. Any development on this prominent site will be the main element that creates the structured urban composition of Castlecrag. To preserve the Griffin HCA, the local centre urban morphology must be congruent and harmonious with the rest of the heritage area.

DRP No.3, 4 September 2026, Design Advice Letter

This letter states that "*The Panel considers that the previous approved DA scheme, with three-storey frontage to Edinburgh Road, is an appropriate scale for the site and the urban context. The reduction in number of floors for the podium from 4 storeys at DRP 2 to 3 Storeys at DRP 4 is therefore supported*" (p.2). Extraordinarily it omits stating at this point that the Revised SSD has 8 storeys rising above the height of the podium.

In the column titled "Matter Raised from DRP No. 2" on page 5 it is appropriately stated that "*The Griffin Heritage Conservation Area adjoins the eastern and part of the southern boundaries of the site. The Panel also understands that the site is within the Willoughby C4 Environmental Living zone. The location is highly significant, and the urban design, architecture and landscape responses must be appropriate to its context and skilfully executed*" (p.5).
The DRP's consideration following DRP No. 3 however hardly mentions the Griffin HCA in its assessment in September 2026. But it states "*The two tower elements contrast with the existing context*" (p.5) as if this were a positive sympathetic to the Griffin HCA, which it is not. It is instead extremely unsympathetic, and is despite the RFI requiring that the built form of any development of this site should be "*subordinate to the natural landscape*"

On page 3, the letter acknowledges "*The Panel … faces a challenging conundrum, where an appropriate urban design outcome could be considered to be in conflict with the State Government policy drive to increase housing numbers*". Disturbingly, it fails to acknowledge that Willoughby City Council is doing heavy lifting with over 6,500 homes planned far exceeding the NSW target.

The approved DA provides 38 dwellings. If the proposed Revised SSD with 92 extra dwellings were approved it would cause irreparable damage to the unique and internationally important Griffin HCA. When Willoughby City Council is already providing over 6,500 dwellings, there can be no justification in permanently despoiling the Griffin HCA that is unlike any other in Australia, for a tiny fraction more dwellings within the local government area.
On page 6 it states that "*The Panel notes that this* [the site location in the C4 Environmental Zone] *is being addressed in … the tree retention strategy*". This statement indicates that the DRP has not fully understood the EIS plans, and has been mislead by the SoHI's false statement claiming that the revised SSD has a mitigation measure of "*retention of existing mature vegetation*" (p,4).

DRP 3 Design Excellence Statement

This document is also extremely disappointing and severely deficient in analysis and documentation of the heritage impact that this proposed Revised SSD would have on the unique Griffin HCA.

(4)(b) states "*the form, arrangement and external appearance of the development will improve the quality and amenity of the public domain.*
The revised podium design, with reduction to 3 storeys on Edinburgh Road, is an appropriate response" without even a mention of the proposed plan's tall towers that will loom over the Griffin HCA, and the non-complying setbacks to the south at the boundary with the Griffin HCA.

(4)(c) states "*The project is unlikely to impact on view corridors*" which is false and misleading as the tall 40 metre towers will dominate views from many areas of the Griffin HCA including The Postern, The Rampart, Turret Reserve and also importantly on approaching the Griffins' Castlecrag from the south, west and north.

(5)(c) states under "*Heritage and streetscape constraints*" that "t*he three-storey podium has the potential to achieve design excellence*", but totally ignores that there would be tall eight-storey towers rising above the podium that are unsympathetic to the Griffin HCA and defy the RFI that states any development of this site should be "subordinate to the natural landscape". It is misleading to single out the podium without considering the whole edifice, as if the 40 metre high towers wouldn't exist. The impact of the proposal on the heritage values of the internationally-renowned Griffin HCA would be, if built, extremely detrimental and should be identified in this way.

IMAGE: Detail from Revised SSDA East elevation, uploaded to NSW Planning Portal on 2 October 2026, FJC Studio 12/08/2026. Note how the podium and towers loom over the Griffin HCA on the low side to the south. The podium's setback to the boundry with the Griffin HCA is badly non-compliant and the trees indicated on this elevation near the boundry with the Griffin HCA would be removed if this Revised SSD were approved. All these factors would cause irreparable harm to the Griffin HCA, an area of unique and exceptional heritage significance.

(5)(g) states "*The reduced height of the podium and the towers reduce shadowing to an acceptable level*", which is a deceptive, misleading and extraordinary statement given the small reduction in height of the proposal. The overshadowing would be reduced by little more than 12% which would still result in many of the houses in The Postern in the Griffin HCA on the low side to the south of the proposal being in shadow even at midday in June.

(5)(k) states regarding "*The impact on special character areas*" that "*The lower podium has an appropriate scale in the surrounding context. The height of the two towers is challenging, given the existing consistent scale along Edinburgh Road and within the adjacent heritage conservation area"*. However, to apparently justify the over-scaled and unsympathetic proposal, it then states that "*this context is likely to change over the next few years*". This is a misleading statement, as it doesn't reveal that there is currently no development taller than two storeys in Castlecrag, the Willoughby City Council zoning is for a maximum of three storeys, and it would be the precedent of the proposal if built that would open the door for high, over-scaled and consequently unsympathetic buildings that would be providing the new context.

(5)(m) states "*Excellence and integration of landscape design.*
The Panel supports the proposed landscape strategy". Disappointingly the panel seems not to have realised that 12 healthy mature Eucalypts and Angophora will be removed (EIS p.6) necessitated by the proposed basement carpark if this proposal were to be built. These 12 beautiful trees would be the only landscape and visual buffer between the Griffin HCA and the proposal. Given that the RFI appropriately requires the SSD to be "*subordinate to the natural landscape*" it is extraordinary that the proposed removal of all the natural landscape between the proposal's southern boundary and the Griffin HCA could be considered excellence, in this area of exceptional heritage significance.

Given that the proposal, with its height, scale, non-complying setbacks and tree loss would be so unsympathetic to the Griffin HCA and the Griffin legacy, it is very disturbing that so many aspects could have been described as having "potential to achieve excellence" in the Design Excellence Statement DRP3.

Conclusion

The Society completely disagrees with the statement in the SoHI page 4 that the "*scale disparity between the development and the Conservation Area, while still present, is materially reduced, and the residual visual and scale impact of the revised proposal on the Griffin Heritage Conservation Area is, on balance, considered acceptable*". This in itself is false and very misleading.

For all the reasons detailed above, it would be appalling if this Revised SSD were approved as it would condemn the unique and internationally renowned Griffin HCA to significant and irreparable harm.

Please read this letter in conjunction with the Society's letter addressed to Minister Scully dated 19 September 2026 that has 26 signatories of eminent professionals and academics from Sydney and well beyond, including the USA, India and UK highlighting just how unique and renowned the Griffins' Castlecrag is and its national and international importance.

For reasons of nationally and internationally significant heritage, the Society implores you to reject the Revised SSD-90134958 in its current form, by requiring very significant reductions of

the height and scale so that it will be "*subordinate to the natural landscape*" as required by the RFI, requiring compliance with setbacks, and requiring the retention of the 12 healthy mature trees, currently slated for removal due to the basement excavation, along the boundary with the Griffin HCA to the south, and also non-compliant setback of the podium. It is essential that these healthy trees are retained. They are the only landscape and visual buffer between the Griffin HCA and its diminutive houses, and the multi-storey proposal.

The Griffin HCA is like no other Heritage Conservation Area in NSW and Australia. It is of national and international importance. We implore you to protect it from permanent damage, an unacceptable impact that would be caused if the Revised SSD were to be approved.

Yours sincerely

Kerry McKillop
Secretary
Walter Burley Griffin Society Inc.
https://www.griffinsociety.org/news

cc. The Honourable Paul Scully MP, Minister for Planning and Public Spaces

Ms Abbie Galvin, Government Architect NSW, information@planning.nsw.gov.au

Ms Alison Lamond, Manager, Major Projects, Heritage NSW, Department of Climate Change, Energy, the Environment and Water, heritagemailbox@environment.nsw.gov.au