

## **SSD-90337724 – 1 King Street, Concord West (Demolition, Remediation and Associated Works)**

**To:** NSW Department of Planning, Housing & Infrastructure

**From:** Resident – 33 George Street, Concord West NSW 2138

**Date:** 15/12/25

**Re:** SSD-90337724 – Demolition, Remediation and Associated Works – 1 King Street, Concord West

Dear Sir/Madam,

As the daughter of the owner of 33 George Street, Concord West, a property directly adjoining the western boundary of the proposed 1 King Street demolition and remediation site. I have lived at this address for over 25 years. This is a long-established family home where extended family regularly gather and stay for extended periods. My elderly mother, who has lived at this address for over 45 years, relies on this home for her physical and mental wellbeing.

The proposed demolition and remediation works, as currently documented, do not adequately protect our home. The immediate proximity of these works will expose us to disproportionate risks including vibration, excavation impacts, contamination, traffic hazards, privacy loss, structural damage, and excessive noise. The potential for harm to my mother's health and wellbeing, as well as to my family's residential amenity, is unacceptable. The State Government should ensure that **all remedies and enforceable conditions are guaranteed before this EIS is approved.**

For these reasons, I object to SSD-90337724 in its current form and submit that it fails to satisfy the requirements of the Environmental Planning and Assessment Act 1979 (EP&A Act) and the Secretary's Environmental Assessment Requirements (SEARs).

### **1. Stormwater Drain Adjacent to Our Home**

**Concerns:** Permanent structural risk; no assurances regarding footings, groundwater, or settlement.

**Required Conditions:**

- Property-specific structural and hydrogeological assessments with detailed modelling.
- Relocation or redesign if risks are identified.
- Protective measures such as retaining walls, underpinning, or waterproofing.
- Long-term monitoring and maintenance program.
- All assessments and mitigation measures incorporated as enforceable conditions of consent.

### **2. Groundwater and Hydrogeological Risk**

**Concerns:** EIS fails to assess property-specific groundwater impacts.

**Required Conditions:**

- Independent hydrogeological modelling.
- Submission and peer review of groundwater management and dewatering plans.
- Continuous boundary groundwater monitoring with automatic alert triggers.
- Stop-work triggers if groundwater levels threaten building stability.
- Independent inspection of footings and subfloor before, during, and after works.

### **3. Structural Risk from Deep Excavation and Basement Works**

**Concerns:** Deep excavation for a two-storey basement immediately adjacent to our home.

**Statutory Non-Compliance:** Sections 4.15(1)(a)(i) and 4.15(1)(b) EP&A Act; SEARs.

**Required Conditions:**

- Independent peer review of excavation, shoring, and retention design prior to works.
- Mandatory pre-, mid-, and post-construction dilapidation surveys by an independent structural engineer.
- Real-time monitoring of settlement, movement, and vibration at the shared boundary.
- Automatic stop-work orders if agreed engineering thresholds are exceeded.

### **4. Vibration Impacts**

**Concerns:** Cracking of walls, ceilings, slabs, damage to footpaths, garden structures, retaining walls, and external storage systems.

**Required Conditions:**

- Boundary vibration monitors calibrated to DIN 4150-3 residential limits.
- Immediate cessation of works if vibration thresholds are exceeded.
- Weekly vibration reporting to residents.

## **5. Contamination, Asbestos, and Air Quality**

**Concerns:** Works occur metres from bedrooms and outdoor living areas; EIS insufficiently details contamination handling, air monitoring, or real-time reporting.

**Required Conditions:**

- Continuous PM10, PM2.5, and asbestos fibre monitoring at the property boundary.
- Independent asbestos hygienist on-site for all demolition activities.
- Immediate stop-work triggers for exceedances.
- Publicly accessible real-time air quality reporting.

## **6. Noise Impacts on a Two-Storey Boundary Dwelling**

**Concerns:** Noise modelling does not reflect elevated bedrooms with direct line-of-sight to works.

**Required Conditions:**

- Update noise modelling for two-storey receiver height and line-of-sight exposures.
- On-site noise monitors at first and second-floor levels of adjoining dwellings.
- Maximum noise thresholds enforced; automatic stop-work triggers.
- Schedule high-noise activities to mid-day periods only.

## **7. Privacy, Amenity, and Boundary Impacts**

**Required Conditions:**

- Solid, continuous privacy screening along the full boundary.
- No temporary structures, storage, or worker access adjacent to the boundary without written consent.

## **8. Cumulative and Staged Impacts**

**Concerns:** EIS ignores cumulative impacts of prolonged demolition, vibration, dust, and noise.

**Required Conditions:**

- Cumulative impact assessment for full staged development, including foreseeable future works.
- Staged mitigation plans for vibration, dust, and noise over total construction timeline.
- Boundary-level monitoring for vibration, dust, and structural movement at each stage.
- Ongoing reporting to adjoining owners for each stage.
- Stop-work triggers for cumulative exceedances.

## **9. Construction Traffic, Safety, Child Protection, and Work Hours**

**Concerns:** Narrow streets, heavy vehicle movements, risks to families, children, elderly residents, and emergency access.

**Required Conditions:**

- Establish mandatory construction vehicle-free zones on 166-49 George Street, Conway Avenue, Rothwell Avenue, Victoria Avenue, and King Street.
- Continuous driveway access and emergency vehicle access at all times.
- On-site traffic controllers for heavy vehicle manoeuvres.
- No queuing of vehicles on George Street.

## **10. Work Hours – Restriction and Protective Measures**

**Concerns:** Proposed hours in EIS unacceptable given proximity to 33 George Street.

**Required Conditions:**

- Weekdays: 8:00 am–5:00 pm; Saturdays: 9:00 am–1:00 pm; no Sundays or public holidays.

- High-impact works (slab breaking, rock cutting) restricted to mid-day periods only.
- Prior notice to adjoining residents for any works outside these hours.
- Stop-work triggers if noise, vibration, dust, or other environmental impacts exceed acceptable levels.

### **11. Absence of Effective Compliance, Complaints, and Enforcement Mechanisms**

**Concerns:** No clear framework for handling complaints or enforcing mitigation measures.

**Required Conditions:**

- Formal complaints handling protocol with defined response times.
- Independent compliance officer to audit and enforce mitigation measures.
- Mandatory reporting to the Department and affected residents on complaints and resolutions.
- Immediate and Strict Penalties for contractor non-compliance.

### **12. Inadequate Insurance and Financial Protection**

**Concerns:** EIS does not demonstrate sufficient insurance or security bonds for adjoining property risk.

**Required Conditions:**

- Full insurance coverage from all contractors for boundary properties.
- Security bonds covering worst-case structural or environmental damage.
- Proof of insurance and bonds provided to the Department before works commence.
- Indemnity clauses in consent ensuring developer liability for any damage.

### **13. Emergency Access and Public Safety Risks**

**Concerns:** Narrow streets and heavy vehicles increase risks of blocked emergency access and delayed response.

**Required Conditions:**

- Maintain continuous emergency vehicle access.
- Traffic management plan with real-time monitoring and on-site controllers.
- Construction vehicle exclusion zones near intersections and narrow streets & proposed Construction Vehicle Exclusion Zone
- Pre-work communication protocol with local emergency services.

### **14. Unreasonable Impact on Long-Term Residential Amenity**

**Concerns:** Prolonged demolition and uncertainty represents material loss of amenity and stress, particularly for my elderly mother.

**Required Conditions:**

- Strict work hour restrictions as detailed above.
- Continuous monitoring for noise, vibration, dust, and air quality at the property boundary.
- Privacy screens and buffers for temporary structures.
- Compensation mechanisms if property damage or severe amenity loss occurs.

### **15. Requested Outcome**

I respectfully request that the Department **refuse approval of SSD 90337724** unless all of the above **conditions and remedies are imposed as enforceable conditions of consent**.

Approval without these conditions would place our family, our long-established home, and my elderly mother at **unreasonable, avoidable, and permanent risk**. While we do not oppose redevelopment in principle, the current proposal is unacceptable in its present form.

I request that the Department require a **revised EIS** or impose the above enforceable conditions **before any approval is granted**.

**Sincerely,**  
**Resident - 33 George St Concord West**