

Submission: 1 King Street Concord West

I make this submission in response to the Environmental Impact Statement (EIS) and supporting technical documentation exhibited for SSD-81999457 on the NSW Planning Portal, named Concord Central.

Before I commence my individual submission, I would like to note an alternate proposal was consulted on and approved by council with information listed here:

<https://collaborate.canadabay.nsw.gov.au/planning-proposal-1-king-st-concord-west>. I ask that all consultation submissions previously made are considered as part of this process, as they relate to the same site, with the same developer. The outcome of that consultation processed referenced above suggested a much more reasonable 700+ apartment development of up to 12 storeys which would have been a good outcome for the Government, without the extreme proposal put forward in this submission.

While a reflection on the integrity of the developer, it's worth considering the previous ingenuous and misleading consultation process led by Billbergia who indicated they were supportive of the [previous submission](#) publicly, while immediately lodging an SSD application after the land was re-zoned by council. This has eroded trust in the developer from the community and while NSW Government housing targets are fair, necessary and we must do more to increase housing supply, it needs to be proportionate to the suburbs they exist in. When considering this request, the NSW Government should consider local amenities like schools, hospitals, recreational and community centres as well as infrastructure etc. which this development significantly lacks meaningful contribution to.

Having reviewed the EIS and its appendices, my submission raises and seeks addressment of a number of concerns, specifically related to infrastructure like **traffic, access and transport capacity, accuracy of the proposed submission's-built form scale and design excellence, overshadowing and view impact statement, impact to the local community's character, as well as amenity impacts when considering access to walkable services, the impact on Concord Hospital and lack of schools to service this development.**

**Overarching recommendation:** In its current form, the proposal is excessive, poorly integrated with its surroundings, and unsupported by existing or planned infrastructure. There are a number of matters that need to be adequately resolved or mitigated in the exhibited documentation, either via a significant reduction in building height and/or number of apartments, new designs that better reflect the proposed development site and a significant uplift of community investment (similar to that from the developer in similar developments like Rhodes Central) that ensure the community also benefits (as the developer will financially) from this development.

## **1. Road Network and Local Infrastructure Impacts**

The proposal significantly underestimates the traffic and infrastructure impacts on **George Street, Queen Street and Pomeroy Street**, which already function as constrained local and collector roads. These streets experience regular congestion during peak periods and are heavily relied upon by residents for school drop-offs, local shopping, and access to arterial roads.

Journey to Work Census data published by the NSW Government demonstrates that a **high proportion of trips in inner-west and Parramatta River suburbs are still undertaken by private vehicle**, including trips to work, education, and local services. This reality contradicts the EIS assumption that the development's residents will predominantly rely on public or active transport.

The introduction of approximately **1,400 apartments, 1468 resident car parks** (resident, retail and visitor) as well as traffic visiting the new central district will generate thousands of additional daily vehicle movements, placing unsustainable pressure on an already constrained road network. The Traffic Impact Assessment fails to meaningfully account for:

- Cumulative background traffic growth including those who do not live in, but visit Concord Central via the single road in an out (George Street)
- School-related trips required
- Commutes to work
- Service and delivery vehicles, and
- Rerouted traffic during rail or road disruptions.

In addition to this, the development site's single access presents as a key issue. The EIS lists traffic modelling but does not transparently show intersection performance forecasts for peak hours (AM/PM) or how traffic will queue at key pinch points (George St × Pomeroy St, King St intersections) after the resolution of proposed actions.

George Street remains effectively the primary and only road access to this precinct, with no robust demonstration that it will operate at acceptable Level of Service under peak conditions with the development's projected additional traffic.

- **Recommendation 1:** Reduction of apartment block height of up to 20 storeys or in line with Government's assessment of George Street's capacity, considering known constraints and current infrastructure challenges.
- **Recommendation 2:** Removal of a tower to make way for, or if not pursued, an alternate location identified for a (and build of) a second overpass (vehicles, including cars and bikes and pedestrians) to Queen Street. This will provide another road outlet from the proposed development, removing George Street as the only road in, or out of the development as well as a new 'underpass' replacing current King Street and Queen Street ageing underpass that is not fit-for-purpose, safe and would not service a development of this size.
- **Recommendation 3:** Revised, second independent and broader modelling with the proposed improvements considered, and varying days, across peak 'core work hours' and during 'school drop off periods. Include a number of samples across varying days across various months, with these dates and times clearly listed for transparency.
- **Recommendation 4:** Reduced number of carparks and improved street signage to ensure maximum limited hours to reduce lack of parking or access to the new 'central village' and increased bike parking spots to encourage active travel.
- **Recommendation 5:** Further enhancements of proposed upgrades to George St as well as further improvements to Queen Street, Pomeroy Street and Beronga Street

with upgrades to roads and infrastructure are staged. In addition, mandate delivery of key intersection upgrades and George Street access improvements prior to staged occupancy triggers (e.g., 25%, 50%, 75% of dwellings occupied) with measurable Key Performance Indicators (KPIs) that ensure roads are upgraded prior to the population increase.

- **Recommendation 6:** Review proposed staging, frontloading the King Street enhancement during stage 1, immediately providing access (vehicle and pedestrian) upon completion of this stage, rather than waiting till Stage 3 for any access benefits.

## **2. Application is considered in isolation and lacks consideration of cumulative impacts across the corridor**

The EIS considers this proposal largely in isolation, despite extensive **existing, proposed and approved upcoming development across Concord West, Homebush, Rhodes, Sydney Olympic Park and Concord.**

When viewed cumulatively, this development contributes to a pattern of overdevelopment that:

- Exceeds the capacity of transport and social infrastructure
- Gradually erodes local amenity
- Concentrates density without commensurate service upgrades, and
- Chases superficial housing targets, without considering community sentiment, needs or impacts.

The failure to properly assess cumulative impacts is a fundamental flaw in the proposal and is inconsistent with strategic planning principles set out by the NSW Government.

- **Recommendation 7:** Reduce maximum tower heights, size and seek further investment required to ensure community needs, in line with other proposed or approved developments (Rhodes Central), as well as considering cumulative impacts on roads, and infrastructure due to other surrounding developments.
- **Recommendation 8:** Seek updated material comparisons/modelling with suburbs of similar density and population profiles, not Strathfield, Rhodes and Olympic Park which are already high density and have supporting infrastructure. FSR references are not appropriate, comparative or fit for purpose.

## **3. Public Transport Capacity – T9 Northern Line**

The **T9 Northern Line is already operating at or near capacity during peak periods**, a situation exacerbated by extensive overdevelopment in **Rhodes and Meadowbank** over the past decade.

The EIS relies on generalised public transport accessibility assumptions, predominantly focussing on Concord West Station usage without adequately addressing:

- Peak-hour train crowding

- Service reliability
- The impact traffic will have on rail safety (passenger and commuter safety)
- The absence of committed funded upgrades to the T9 line
- The lack of a safe, cycleway to and poor to no integration with the proposed North Strathfield Metro Station, and
- The inability for bus services on George Street, as impacted by other existing road infrastructure or construction proposed in this development proposal.

While the EIS references proximity to Concord West rail station, it does not adequately respond to long-standing local feedback that train services already experience significant crowding, forcing commuters to wait for subsequent services during peak. It also does not account for upgrades to the station to provide additional shade and coverage to travellers during peak hours of operation.

- **Recommendation 9:** Work with Transport NSW to identify ways to remediate current constraints on the existing line, detailing these in final plans, noting the documentation provided indicates seating as ‘not available during peak times’ (a challenge for those with disabilities or other needs, as experience by the project team themselves when modelling. Consider additional station requirements like platform coverage to ensure traveller safety and developer contributions for upgrades.
- **Recommendation 10:** Develop revised active transport improvements, including direct pedestrian and possibly cycle-way to the proposed upcoming North Strathfield Metro Station, providing direct and accessible access to the transport hubs referenced multiple times in this submission. Additionally, a cycle lane or road markings from the development to local parklands to ensure access to upcoming light rail connections.

#### 4. Lack of Health and Education Services

The proposal fails to adequately address the capacity of essential services required to support an additional population equivalent to a small suburb.

In particular:

- **Concord Hospital** already services a wide catchment and operates under significant demand pressures
- Local **public primary and high schools** are at or approaching enrolment capacity
- The EIS provides no credible evidence that health or education infrastructure will be expanded to meet demand generated by 1,400 new dwellings.

While Concord Hospital’s recent redevelopment (<https://www.nsw.gov.au/health-and-wellbeing/health-infrastructure-projects/concord-hospital-redevelopment-stage-1>) increased its inpatient capacity to around 563 beds the NSW Government indicates that emergency department presentations exceed 40,000 per year and NSW hospitals continue to experience significant capacity pressures and bed block issues.

Local High Schools are at capacity, including those referenced in the submission proposal like Concord High which has a large amount of demountable to keep up with student

population, and is also 3.9km away, not within a walkable distance, or easily accessible by transport links, increasing the need to travel to these by car.

This omission places unacceptable strain on existing residents and services and again, does not consider cumulative impacts from surrounding suburbs or developments (including multiple developments by the same building in Rhodes).

- **Recommendation 11:** The developer contributes to additional infrastructure funding for local hospital expansions, as deemed appropriate by the NSW Government to sufficiently support the surrounding community population.
- **Recommendation 12:** The NSW Government reserves a portion of the site for (and commits to building) a new Public Government High School to service the area of Concord West.

## 5. Built Form, Height & Urban Design Concerns

The Urban Design Reports (appendices K and L) and Architectural Drawings (Appendix B) propose towers up to 38 storeys in height, representing a major scale change compared to the existing neighbourhood and immediate low–mid-rise residential streets.

### a) Lack of Transitional Built Form

The EIS attachments do not convincingly demonstrate a graduated transition from transient high-density buildings to existing low–mid-rise residential fabric. In fact, the images provided in Appendix R show a substantial impact from almost all angles (including severe, irreversible impacts at the 207A Queen Street). The proposal fails to consider visual impact for recreational users who use Bicentennial and surrounding parklands, as well as students at Victoria Ave Public School.

The urban design response must articulate clear measures for stepped height transitions, slender tower forms, enhanced podium setbacks, greater tower separation, and articulated facades to reduce bulk and street wall dominance. This does not currently present in proposed imagery, designs or visual impact recreations.

### b) Design Excellence and NSW Statutory Policy

The planning proposal is subject to design excellence requirements under Clause 6.14 of the Canada Bay LEP, yet the Urban Design Report does not provide evidence of an independent, merit-based design excellence process.

The consent authority should require an independent Design Excellence Competition or Review Panel evaluation to ensure that any high-rise components manifest best-practice architecture and meaningful improvements in public domain and amenity outcomes.

### c) Visual Impact and Streetscape

The Visual Impact Assessment (Appendix D) acknowledges visual significance of the site but does not fully address cumulative impact of tall buildings on neighbourhood character along George Street, King Street and adjacent residential streets.

#### d) Shadowing, Solar Access and Neighbour Amenity

The EIS should include detailed shadow diagrams (including mid-winter and equinox) showing the impact of proposed buildings on the following:

- Residential properties south and east of the site, particularly morning sun access.
- Public open spaces, pedestrian links and civic plaza areas within the site.
- Current documentation does not provide a full set of comparative shadow studies that allow residents to understand the magnitude of overshadowing impacts at critical times of year

The proposal also does not comply with solar access standards.

#### f) Wind considerations are superficial and not realistic when considering all proposed towers

- **Recommendation 13:** Revised designs that focus on a reduction in tower height (across all buildings, no higher than 20 storeys), more defined stepped height transitions, greater slender tower formations, enhanced podium setbacks, greater tower separation, and articulated facades that incorporate greenery to better blend in with the surrounding environment. Additionally, revised designs that increase sunlight to central park, communal space, apartments in this development (some of which receives 0 hours of sunlight) to achieve solar compliance standards and to limit impact on surrounding neighbours.
- **Recommendation 14:** Further community consultation and advertised Town Halls to understand impacts be it social, psychological, actual and perceived, with an action plan developed to address this community feedback. This has not been sufficiently addressed in Appendix D, Community Engagement Table and not adequately covered in Appendix X, Community Infrastructure Needs Assessment.
- **Recommendation 15:** Consideration of Canda Bay's LEP and further council consultation to understand an appropriate compromise that better reflects the area, while contributing to NSW Government Housing Supply targets. This development is more than twice the height previously approved by Canada Bay Council.
- **Recommendation 16:** Increased retail space (which is artificially inflated by inclusion of Childcare space), in line with original proposal and increase to community amenities, including new, developer funded local pool and community centre as provided with a smaller, Rhodes Development (Rhodes Central) as opposed to resident pool. This would ensure 'walkable' and accessible nature of the proposed development.
- **Recommendation 17:** Amendments to designs to better maintain solar access to nearby residences and public open spaces, including the proposed central park.

#### 6. Affordable Housing isn't sufficient:

The affordable housing quantum and type (size mix, income eligibility) requires clearer commitment to ensure the development does not disproportionately serve external investors rather than local community needs.

- **Recommendation 18:** The current proposal should include additional low-income housing, or 'buy-to-rent' housing components to ensure housing supply is accessible by a range of community members.

## 7. Impacts for Pets

Noting the NSW Government's strong commitments to pets, and the role they play in supporting individuals as referenced by **Minister for Housing & Homelessness Rose Jackson** 'that pets are part of people's families', and revised rental laws, it is feasible to see an increase in pets. There should be an allocated dog park for pets to exercise, safely, out of reach of those using the central park.

- **Recommendation 19:** Include provision of a small, fenced off dog park and a playground for children, with no dog access to ensure safe access for pets and children alike as part of this development.

## 8. Staging provides limited benefits to the community until completion of stage 3

The proposal provides limited benefits to the community for several years, due to the proposed staging approach which sees the central park not constructed until stage 3, nor the provision of pedestrian or vehicle access until completion of Stage 2. A more appropriate staging approach would deliver impacts quickly for the development and deliver a more logical grouping.

- **Recommendation 20:** Bring forward the central park and walkway proposed in Stage 3 to stage 1, frontloading the positive impact for community and providing greater access to Concord West Station upon the completion of Stage 1 that would otherwise see pedestrians re-routed around George Street and Victoria Ave to access the station.
- **Recommendation 21:** Group Buildings P1, P2, P3, B1, B2, B3 and C (appendix B) as Stage 1 and reduce maximum heights to a maximum of 20 storeys. Group buildings D and E (reducing height to the same height as building D) and complete as Stage 2 bringing forward community benefits. Remaining buildings A1 and A2 to be completed as Stage 3, providing final retail boost once population increases and minimising impact to those accessing previous stages due to isolated nature of buildings.

## 9. Connecting to Country Report presents as biased

The Connecting to Country Report (appendix O) is skewed towards positive feedback comments at the proposal, without designs adequately addressing any of the ideation feedback or 'how might we' statements.

- **Recommendation 22:** Independent Connecting to Country Impact assessment delivered by (and attended by) the NSW Government and/or NSW Government

representatives (as opposed organised by the developer) with more defined action plans on how concerns or opportunities will be addressed.

## Conclusion

While the 1 King Street proposal is strategically located next to a transport node and presents a unique opportunity to increase much needed housing in NSW, this cannot be the only consideration when tabling this proposal. In truth the EIS and supporting attachments do not sufficiently demonstrate that traffic, transport, design excellence standards, shadowing, or community and social infrastructure impacts have been mitigated to acceptable levels. I request the Department refuse consent in its current form or require significant amendments and conditions to protect existing amenity and ensure a genuinely high-quality outcome for Concord West that meaningfully considers the community consultation feedback and needs identified via this (and previous) consultative activity.

With amendments, this can be a major and impactful development for the people of Concord West, Billbergia and NSW Government alike. Thank you for considering my submission.

Sincerely,  
Hayden Beven, Local Resident