

# **Submission: SSD-81999457 – Mixed-Use Development at 1 King Street, Concord West (Concord Central)**

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, known as *Concord Central*.

Before addressing my specific concerns, I note that an alternate planning proposal for the same site was publicly consulted on and approved by the City of Canada Bay Council, with information available at:

<https://collaborate.canadabay.nsw.gov.au/planning-proposal-1-king-st-concord-west>

That proposal contemplated approximately 700 dwellings with maximum building heights of up to 12 storeys. This outcome represented a more proportionate and contextually appropriate development response, aligned with the capacity of local infrastructure and the surrounding built form. I respectfully request that submissions made during that consultation process be considered as part of this assessment, noting they relate to the same site and developer.

The developer publicly indicated support for the Council-endorsed planning proposal, prior to lodging a substantially larger State Significant Development application immediately following rezoning. This sequence has eroded community trust and is relevant when assessing the credibility of commitments made within the EIS.

While NSW Government housing targets are necessary and supported, housing delivery must occur in a manner consistent with orderly and economic planning, infrastructure capacity, design excellence, and community wellbeing. This proposal does not currently demonstrate that outcome.

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## **Overarching Planning Position**

In its current form, the proposal is excessive in scale, poorly integrated with its surroundings, and unsupported by existing or committed infrastructure. The EIS does not adequately resolve or mitigate impacts relating to traffic and access, cumulative development, public transport capacity, social infrastructure, built form, solar access, ventilation, and staging of community benefit.

I respectfully request that consent be refused, or alternatively that the proposal be required to undergo substantial amendment prior to any approval being contemplated.

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## **1. Road Network Capacity, Access and Traffic Impacts**

The proposal significantly underestimates impacts on George Street, Queen Street and Pomeroy Street, which already operate under constrained conditions and function as key local and collector roads relied upon for school drop-offs, local trips and access to arterial routes.

Journey-to-Work Census data demonstrates that a substantial proportion of trips in inner-west and Parramatta River suburbs continue to be undertaken by private vehicle. This contradicts assumptions within the EIS that future residents will predominantly rely on public or active transport.

The introduction of approximately 1,400 dwellings and 1,468 parking spaces will generate substantial additional vehicle movements. The Traffic Impact Assessment fails to adequately account for cumulative background growth, school-related trips, peak commuting patterns, service and delivery vehicles, and traffic rerouting during rail or road disruptions.

Further, the site relies almost entirely on George Street as the sole vehicular access, with no robust demonstration that acceptable Levels of Service can be maintained during peak periods.

### **Grouped Recommendation – Road Network and Access**

The proposal should be refused or substantially amended unless:

- Building heights and dwelling yield are materially reduced (not exceeding 20 storeys) to align with road capacity
- A second permanent vehicle, pedestrian and cycle connection to Queen Street is delivered, including replacement of the existing King/Queen Street underpass
- Independent, transparent traffic modelling is undertaken, accounting for cumulative growth and peak conditions
- Parking provision is reduced and active transport infrastructure expanded
- Road upgrades are mandated prior to staged occupancy, with enforceable KPIs
- King Street access works are delivered in Stage 1

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## **2. Failure to Address Cumulative Development Impacts**

The EIS assesses the proposal largely in isolation, despite significant existing, approved and proposed development within Concord West and surrounding suburbs.

Notably, the proposal fails to account for cumulative impacts arising from:

- The recently completed **Canopy Apartments** development (approx. 100 dwellings), Rothwell Avenue.
- The proposed redevelopment at **176–184 George Street**

- Extensive high-density development across Rhodes, Homebush and Sydney Olympic Park

When considered collectively, these developments exacerbate pressure on roads, public transport, schools, healthcare, open space and community facilities. The omission of these developments from cumulative modelling represents a fundamental flaw in the EIS.

### **Grouped Recommendation – Cumulative Impacts**

The proposal should not proceed unless a comprehensive cumulative impact assessment is undertaken and demonstrates that combined impacts can be accommodated. If this cannot be demonstrated, the proposal must be materially reduced in scale and intensity.

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## **3. Public Transport Capacity and Active Transport**

The T9 Northern Line is already operating at or near peak capacity. The EIS relies on proximity-based assumptions without adequately addressing crowding, service reliability, safety, or the absence of committed capacity upgrades.

The proposal also fails to meaningfully integrate with the future North Strathfield Metro Station due to poor pedestrian and cycle connectivity.

### **Grouped Recommendation – Public Transport and Active Travel**

Consent should not be granted unless:

- Transport for NSW-endorsed mitigation measures address peak crowding on the T9 line
- Developer contributions fund station upgrades, including shelter, accessibility and safety improvements
- Direct, safe pedestrian and cycle links are delivered to Concord West Station and the future North Strathfield Metro
- Active transport connections to local parklands and future light rail are improved

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## **4. Health, Education and Social Infrastructure**

The proposal does not demonstrate how essential services will accommodate a population increase equivalent to a small suburb.

Concord Hospital already experiences significant demand pressures, while local public schools are operating at or near capacity. The EIS identifies no funded or committed expansion of health or education infrastructure.

### **Grouped Recommendation – Social Infrastructure**

The proposal should not proceed without:

- Developer contributions toward health infrastructure expansion, including Concord Hospital
  - Reservation of land and commitment to delivery of a new public high school for Concord West
  - Demonstration that cumulative demand on social infrastructure has been planned for and funded
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## **5. Built Form, Height, Shadowing, Solar Access and Ventilation**

The proposed towers of up to 38 storeys represent a profound and unjustified departure from the surrounding low–mid-rise context. The EIS fails to demonstrate appropriate transitions, resulting in excessive bulk and visual dominance.

Shadow diagrams within the EIS demonstrate that:

- Numerous communal areas receive insufficient sunlight, with some receiving 0 hours of direct solar access
- The proposed central park is significantly overshadowed for much of the day due to the height and proximity of surrounding towers
- Surrounding residential properties experience unacceptable loss of solar access

The proposal also fails to demonstrate adequate compliance with ventilation standards. Tower proximity and layout would result in poor daylight penetration, limited cross-ventilation and apartments reliant on mechanical systems, representing unacceptable residential amenity outcomes.

Despite being subject to design excellence provisions under the Canada Bay LEP, no independent design excellence process has been demonstrated.

### **Grouped Recommendation – Built Form and Amenity**

The proposal should be refused unless substantially redesigned to:

- Reduce maximum building heights to no more than 20 storeys
- Provide stepped transitions, slender towers, increased setbacks and greater separation

- Demonstrate full compliance with solar access standards for apartments, communal areas and the central park
  - Achieve adequate natural ventilation and daylight access
  - Be subject to an independent design excellence review or competition
  - Protect amenity of neighbouring properties and public open spaces
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## **6. Affordable and Diverse Housing**

The affordable housing component lacks clarity and scale, risking an outcome that disproportionately serves external investors rather than local housing needs.

### **Grouped Recommendation – Housing Diversity**

The affordable housing provision should be expanded to include increased low-income housing, build-to-rent or similar tenure models, and clear eligibility criteria that support local and key worker housing needs.

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## **7. Public Open Space, Community Facilities, Pets and Children**

Community benefits are largely deferred or internalised, rather than delivered as genuinely public infrastructure.

### **Grouped Recommendation – Community Amenities**

The proposal should deliver:

- The central park and pedestrian connections in Stage 1
  - Increased publicly accessible retail and community facilities
  - A fenced dog park and a separate children’s playground
  - Consideration of a developer-funded community centre and aquatic facility, consistent with comparable developments such as Rhodes Central
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## **8. Staging and Timing of Community Benefit**

The proposed staging defers meaningful community benefit until later stages, despite early population impacts.

### **Grouped Recommendation – Staging**

The staging strategy must be amended to front-load public domain works, open space and access improvements, with infrastructure delivery clearly linked to occupancy thresholds.

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## **9. Connecting to Country**

The Connecting to Country report lacks independence and does not demonstrate how feedback has been meaningfully embedded into design outcomes.

### **Grouped Recommendation – Cultural Outcomes**

An independent Connecting to Country assessment should be undertaken, facilitated by NSW Government representatives, with defined and enforceable actions embedded in approval conditions.

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## **Conclusion**

When assessed against section 4.15 of the Environmental Planning and Assessment Act, relevant SEPPs, the Apartment Design Guide and City of Canada Bay LEP objectives, the proposal fails to demonstrate that its impacts have been adequately mitigated or justified.

The cumulative infrastructure burden, unacceptable overshadowing and ventilation outcomes, excessive scale, and delayed community benefit warrant refusal in its current form.

Should consent be contemplated, it must be subject to substantial redesign, materially reduced height and yield, enforceable infrastructure delivery and significantly increased community investment to ensure a sustainable and genuinely beneficial outcome for Concord West.

**Warm regards,**  
**Martin Cork**  
Local Resident