



Visual Impact Assessment

Green Square Town Centre Stage 3 – Sites 7, 17 and 18

960A Bourke Street, Zetland

Submitted to the NSW Department of Planning, Housing and Infrastructure
on behalf of Mirvac Green Square Pty Limited

SSD-83899206

Prepared by Colliers Urban Planning

17 December 2025 | 2240198



'Gura Bulga'

Liz Belanjee Cameron

'Gura Bulga' – translates to Warm Green Country. Representing New South Wales.



'Dagura Buumarri'

Liz Belanjee Cameron

'Dagura Buumarri' – translates to Cold Brown Country. Representing Victoria.



'Gadalung Djarri'

Liz Belanjee Cameron

'Gadalung Djarri' – translates to Hot Red Country. Representing Queensland.

Colliers Urban Planning acknowledges the Traditional Custodians of Country throughout Australia and recognises their continuing connection to land, waters and culture.

We pay our respects to their Elders past and present.

In supporting the Uluru Statement from the Heart, we walk with Aboriginal and Torres Strait Islander people in a movement of the Australian people for a better future.

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Executive summary

Mirvac Green Square (the applicant) has submitted a State significant development application (SSDA) (SSD-83899206) to the NSW Department of Planning, Housing and Infrastructure (the Department) seeking development consent for renewal of sites 7, 17 and 18 of stage 3 of the Green Square Town Centre (the site) for the purposes of build-to-rent housing (the proposal).

Colliers Urban Planning in collaboration with Virtual Ideas and CMS Surveyors has prepared this visual impact assessment (VIA) on behalf of the applicant to support the application by addressing the Planning Secretary's Environmental Assessment Requirements (SEARs) issued by the Department.

To inform the VIA, photos showing the existing visual condition and photomontages showing the future visual condition should the proposal be developed were prepared for nearby viewpoints in the public domain.

Due largely to the presence of existing, larger scale, residential and non-residential built elements in the landscape, the sensitivity of the public domain in the proposal's visual catchment to the nature of change proposed ranges from low to medium.

Due largely to its scale, the magnitude of the proposal's visual impact on the public domain in the proposal's visual catchment ranges from considerable to dominant.

Combining these assessments determined that the significance of proposal's visual impact is as follows:

- **Viewpoint 1 Green Square Station:** moderate significance of visual impact
- **Viewpoint 2 The Drying Green:** moderate significance of visual impact
- **Viewpoint 3 Merton Street (Zetland Estate Heritage Conservation Area):** moderate significance of visual impact

It is acknowledged that the scale of the proposal is considerable. However, this is considered justified on broader planning grounds and visual and view impact grounds.

In terms of broader planning grounds, the proposal:

- furthers the objects of the EP&A Act 1979, including promoting ecologically sustainable development in particular through promoting intergenerational equity as it relates to access to housing
- is consistent with the National Housing Accord and current government planning priorities, delivering a greater amount and choice of new homes, including more affordable homes in a BTR arrangement
- is consistent with the strategic planning framework and section 9.1 directions, locating new homes in a well located part of the exiting urban area, in this instance the Green Square Town Centre, opposite Green Square Station and adjacent to a trunk bus routes, and adjoining Green Square Plaza as the heart of the town centre
- is consistent with section 4.15 of the EP&A Act, the site is highly suited to the proposal due to its large size which enables impacts to be better managed without unacceptable adverse impact on other land.

In terms of visual impact grounds, the proposal:

- has a magnitude and significance of visual impact that is consistent with the reasonable expectations established for the site by the planning framework
- is responsive to its strategic visual context, strengthening the urban form legibility of the Green Square Town Centre
- is consistent with the existing and emerging prevailing visual character of Green Square Town Centre dominated by larger scale, higher rise, residential focussed mixed use buildings, and finer grain visual elements such as being built to adjoining street alignments

- does not impact designated important public view corridors
- will better define and enclose Green Square Plaza and the Drying Green
- has a height and bulk compatible with nearby and other buildings in Green Square Town Centre
- will not be visually overwhelming or overbearing when seen from or in the context of the adjoining Green Square Plaza and the Drying Green
- enhances the amenity of Green Square Plaza, the Drying Green and the town centre more generally through measures such as a permeable network of public spaces, deep soil plantings, active and high quality street frontages, a podium that mediates the visual impact of taller buildings, well separated buildings, and an overall distinct, varied but visually cohesive composition
- exhibits design excellence, including through high quality materiality and colour.

The VIA has found that primary design measures relating to siting and layout, size and scale, and form and massing adequately mitigate the visual impact of the proposal. As such, additional fundamental or large-scale mitigation measures are not considered necessary.

While acknowledging that the proposal will have a visual impact, overall on the balance of relevant considerations this impact is considered acceptable. As such, it is the conclusion of the VIA that the proposal can be supported on visual impact grounds.

Glossary

Table 1 Glossary

Term or abbreviation	Meaning
AHD	Australian height datum
Applicant	Mirvac Green Square Pty Limited
Application	State significant development application SSD-83899206
BDCP 2022	Bayside Development Control Plan 2022
Characteristics	Elements, or combinations of elements, which make a contribution to distinctive landscape character (GLVIA3, Landscape Institute and IEMA, 2013)
Department	NSW Department of Planning, Housing and Infrastructure
Eastern City SEPP	State Environmental Planning Policy (Precincts–Eastern Harbour City) 2021
EIS	Environmental impact statement
Elements	Individual parts which make up the landscape, such as, for example, trees, hedges and buildings (GLVIA3, Landscape Institute and IEMA, 2013)
Feature	Particularly prominent or eye-catching elements in the landscape, such as tree clumps, church towers or wooded skylines (GLVIA3, Landscape Institute and IEMA, 2013)
FSR	Floor space ratio
GFA	Gross floor area
GLVIA3	Guidelines for Landscape and Visual Impact Assessment, Third edition
HCA	Heritage conservation area
Key characteristics	Those combinations of elements which are particularly important to the current character of the landscape and help to give an area its particularly distinctive sense of place (GLVIA3, Landscape Institute and IEMA, 2013)
Landscape	An area, as perceived by people, the character of which is the result of the action and interaction of natural and/or human factors (GLVIA3, Landscape Institute and IEMA, 2013)
Landscape character types	These are distinct types of landscape that are relatively homogeneous in character. They are generic in nature in that they may occur in different areas in different parts of the country, but wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, vegetation and historical land use and settlement pattern, and perceptual and aesthetic attributes (GLVIA3, Landscape Institute and IEMA, 2013)
Magnitude	A term that combines judgements about the size and scale of the effect, the extent of the area over which it occurs, whether it is reversible or irreversible and whether it is short or long term in duration (GLVIA3, Landscape Institute and IEMA, 2013)
Planning Systems SEPP	State Environmental Planning Policy (Planning Systems) 2021
Proposal	Build-to-rent housing
RL	Reduced level
SEARS	Planning Secretary's Environmental Assessment Requirements
Sensitivity	A term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor (GLVIA3, Landscape Institute and IEMA, 2013)
Significance	A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic (GLVIA3, Landscape Institute and IEMA, 2013)

Term or abbreviation	Meaning
Site	Sites 7, 17 and 18 of stage 3 of the Green Square Town Centre
SSD	State significant development
SSDA	State significant development application
Townscape	The character and composition of the built environment including the buildings and the relationships between them, the different types of urban open space, including green spaces, and the relationship between buildings and open spaces (GLVIA3, Landscape Institute and IEMA, 2013)
VIA	Visual and view impact assessment
Visual amenity	The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area (GLVIA3, Landscape Institute and IEMA, 2013)
ZTV	Zone of Theoretical Visibility

1.0 Introduction

Mirvac Green Square (the applicant) has submitted a State significant development application (SSDA) (SSD-83899206) to the NSW Department of Planning, Housing and Infrastructure (the Department) seeking development consent for renewal of sites 7, 17 and 18 of stage 3 of the Green Square Town Centre (the site) for the purposes of build-to-rent housing (the proposal).

1.1 Purpose of this visual and view impact assessment

Colliers Urban Planning in collaboration with Virtual Ideas and CMS Surveyors has prepared this visual impact assessment (VIA) on behalf of the applicant to support the application by addressing the Planning Secretary's Environmental Assessment Requirements (SEARs) issued by the Department as shown in the below table.

Table 2 Relevant SEARs issued by the Department on 15 May 2025

Issue	Assessment Requirements	Supporting Documentation
7. Environmental Amenity	- Assess amenity impacts on the surrounding locality, including...view loss and view sharing. - A high level of environmental amenity for any surrounding residential or other sensitive land uses must be demonstrated.	If required: View Impact Analysis
8. Visual Impact	- Provide a visual analysis of the development from key viewpoints, including photomontages or perspectives showing the proposed and likely future development. - If the proposal would result in significant visual impact not anticipated by the planning controls, provide a visual impact assessment that addresses the visual impacts of the development on the existing catchment.	- Visual Impact Analysis If required: - Visual Impact Assessment

Source: The Department

1.2 Structure of this visual and view impact assessment

The structure of this VIA is as follows:

- Part 1 Introduction:** Identifies the purpose and structure of this VIA
- Part 2 The site:** Describes the site and its context
- Part 3 Proposal:** Outlines the proposal
- Part 4 Planning framework:** Identifies the relevant parts of the planning framework to the application
- Part 5 Key issues:** Identifies the key issues to be considered by the VIA
- Part 6 Method:** Outlines the method used by this VIA
- Part 7 Visual impact assessment:** Undertakes VIA of the proposal's impact on views currently obtained from the nearby public domain and impact on the visual character of this nearby public domain supported by photos and survey aligned photomontages
- Part 8 Discussion of key issues:** Discusses the key issues relevant to VIA
- Part 9 Mitigation measures:** Identifies whether any appropriate primary and / or secondary mitigation measures are recommended to address visual and view impact
- Part 10 Conclusion:** Identifies whether the proposal can be supported on visual and view impact grounds
- Appendix A:** Provides the evidence base of photos and photomontages upon which this VIA relies.

As it forms part of the larger application, the VIA does not repeat matters more appropriately covered in other documents. In particular, it defers to and relies on statements in:

- planning documents addressing matters such as land zoning and permissibility (eg, the Environmental Impact Statement (EIS) prepared by Colliers Urban Planning)
- design documents addressing matters such as design intent, strategies and measures.

As such, it should be read together with these other documents.

Artist impressions of the proposal are provided throughout the VIA. These supplement the survey aligned photomontages, and are particularly helpful in better understanding more detailed design aspects such as architectural character. This includes the ground plane relationship between built form and the adjoining public domain, materiality and colour, and landscaping.

2.0 The site and its context

2.1 The site

The site is located at 960A Bourke Street, Zetland, and is legally described as Lot 6, DP 1199427 (refer below figure).

It has a roughly triangular shape, and is bound by Tweed Place to the north, Ebsworth Street to the east, Paul Street to the south and Green Square Library to the west.

The site is vacant aside from an at-grade car park, construction-related structures and a small amount of vegetation.



Figure 1 Aerial photograph showing the site boundaries

Source: Nearmap and Colliers Urban Planning

2.2 The site context

The site is located in the Green Square Town Centre, opposite Green Square Station and adjoining Green Square Plaza as the heart of the town centre. As can be seen in the following figures, the local site context is highly urban, and is characterized by existing, larger scale, residential and non-residential built elements and features.

In the broader context, the site is contained in the City of Sydney Local Government Area (LGA) 3.5km (approx.) south of the Sydney Central Business District (CBD) and 2km southwest of Moore Park.



Figure 2 Green Square Plaza and Library

Source: Virtual Ideas



Figure 3 Green Square Town Centre seen from the intersection of Bourke Street, Bourke Road, O’Riordan Street, and Botany Road

Source: Virtual Ideas



Figure 4 Existing development on the northern side of Zetland Avenue adjoining the site

Source: Virtual Ideas



Figure 5 The Drying Green

Source: Virtual Ideas



Figure 6 Zetland Avenue

Source: Virtual Ideas



Figure 7 Green Square Town Centre seen from Paul Street and Geddes Avenue

Source: Virtual Ideas



Figure 8 Green Square Town Centre seen from Ngamuru Avenue

Source: Virtual Ideas



Figure 9 Ebsworth Street

Source: Virtual Ideas

3.0 The proposal

This SSDA seeks consent for the construction of three BTR buildings which will integrate residential, retail, residential amenity and public domain uses. Specifically, this SSDA seeks approval for:

- Excavation and enabling works.
- Construction of 3 mixed use BTR buildings up to 21 storeys in height, comprising:
 - Approximately 500 BTR dwellings including a variety of dwelling types including Studio, 1, 2 and 3-bedroom apartments, a portion of which will be affordable housing.
 - Non-residential floor space including retail, food and beverage tenancies.
 - A shared basement level, incorporating carparking and servicing.
- Public domain and landscaping improvements, including:
 - Internal pedestrian laneways, pathways and through-site links.
 - Tree removal, protection, new plantings and landscaping works.
- Car parking to service the proposed development.
- Utility and stormwater connections to support the new development.
- Concurrent amendments to the Sydney Local Environmental Plan (Green Square Town Centre) 2013 to facilitate the SSDA.

The below figures provide artist impressions of the proposal.



Figure 10 Artist impression of the proposal

Source: Design team



Figure 11 Artist impression of the proposal seen from Paul Street and Ebsworth Street

Source: Design team



Figure 12 Artist impression of the proposal seen from Ebsworth Street

Source: Design team



Figure 13 Artist impression of the proposal seen from Ebsworth Street

Source: Design team

4.0 The planning framework

The planning framework comprises a series of acts, regulations, planning instruments, and other supporting guidance.

Not all parts of the planning framework are highly relevant to VIA.

The most relevant parts are:

- the Environmental Planning and Assessment Act 1979 (EP&A Act 1979)
- the SEARS
- Sydney Local Environmental Plan (Green Square Town Centre) 2013 (GSTCLEP 2013).

Under section 2.10 of the State Environmental Planning Policy (Planning Systems) 2021 (the Planning Systems SEPP) development control plans do not apply to SSDAs..

In terms of considering the planning framework, the following is noted:

- as with all planning decisions, consideration and weighing of a large number and range of relevant environmental planning matters in addition to visual impact is required. In this regard, particular reference is made to the separate, supporting EIS
- due to their large number and range, often provisions for these matters conflict or are in tension. Consistent with the above, this requires the consideration and weighing of these measures as part of the planning balance
- there is considerable overlap between VIA, planning, and design matters. As such, this VIA focusses on those which are most appropriately addressed by the VIA such as views, visual amenity, and visual character. Broader 'parent' matters such as amenity, and character are only addressed generally by exception where it is regarded as particularly important, or provides key context. Of note in this regard, consideration of design excellence is deferred to the separate planning and design documentation.

4.1 Environmental Planning and Assessment Act 1979

The most relevant parts of the EP&A Act 1979 to VIA are:

- 1.3 'Objects of Act'
- 4.15 'Evaluation'.

4.1.1 Section 1.3 Objects of Act

The EP&A Act 1979 has a number and range of objects (section 1.3 'Objectives of Act').

The most relevant object to VIA is related to good design and amenity (direct quote in italics):

- '(g) *To promote good design and amenity of the built environment*'.

4.1.2 Section 4.15 Evaluation

This section of the EP&A Act 1979 specifies matters for consideration that the Department is to take into consideration as relevant when determining the SSDA. This includes amongst other things the statutory planning framework, the likely impacts of the development, the suitability of the site for the development, and the public interest. The most relevant part to VIA is consideration of the likely impacts of the development.

4.2 The SEARS

The SEARS specify the issues, assessment requirements, and supporting information to be addressed in preparing and submitting the SSDA part of the application.

As has already been noted, this includes address of visual impact.

4.3 Sydney Local Environmental Plan (Green Square Town Centre) 2013

Under the SLEP 2013 the site is subject to the key planning provisions shown in the below table.

Table 3 Key planning provisions applying to the site – Sydney Local Environmental Plan (Green Square Town Centre) 2013

Matter	Key planning provision
Land zoning	MU1 'Mixed Use' zone
Height of buildings	RL50 to RL 83
Floor space ratio	5.47:1

Source: NSW Planning Portal (Spatial Viewer)

The most relevant parts of the SLEP 2012 to VIA are:

- section 1.2 'Aims of Plan'
- section 2.3 'Zone objectives and Land Use Table'
- section 4.3 'Height of buildings'
- section 4.4 'Floor space ratio'
- section 6.9 'Design excellence'.

4.3.1 Section 1.2 Aims of Plan

The aims of this section seek to give effect to the intent of the NSW Government and City of Sydney strategic planning framework to grow the Green Square Town centre as the major centre and core of the Green Square Urban Renewal Area.

This is to occur in conjunction with the creation of a high quality public domain. This is evidenced by the following aim (iv), which seeks to *'establish a significant new people-oriented public town square and other vibrant public plazas and public spaces'*.

On this basis, the most relevant aims to VIA are related to quality of public domain, and quality of building interfaces adjoining the public domain.

4.3.2 Section 2.3 Zone objectives and Land Use Table

The objectives for the MU1 'Mixed Use' zone are not directly relevant to VIA.

4.3.3 Section 4.3 Height of buildings

All objectives are relevant to VIA. They address height transitions, sharing of views, restricting taller buildings, and definition of the public domain. They are (direct quote in italics):

- (a) *'to ensure acceptable height transitions between new development and heritage items and buildings in heritage conservation areas'*
- (b) *'to ensure sharing of views'*
- (c) *'to ensure acceptable height transitions from the Green Square Town Centre to adjoining areas'*
- (d) *'to ensure the amenity of the public domain by restricting taller buildings to only part of a site,'*
- (e) *'to ensure the built form contributes to the physical definition of the street network and public spaces'.*

4.3.4 Section 4.4 Floor space ratio

The most relevant objective to VIA is related to desired future character and amenity as follows (direct quote in italics):

- *(d) 'to ensure that new development reflects the desired character of the locality in which it is located and minimises adverse impacts on the amenity of the locality'.*

4.3.5 Section 6.9 Design excellence

While many of these matters for consideration by the consent authority under this division are relevant to VIA, most are more appropriately addressed in the planning and design documentation. However, the following matters related to view corridors, and the location of towers are also highly relevant to VIA (direct quote in italics):

- *'(c) whether the proposed development detrimentally impacts on view corridors*
- *(d) how the proposed development addresses the following matters:*
 - *(iv) the location of any tower proposed, having regard to the need to achieve an acceptable relationship with the other towers (existing or proposed) on the same site or on neighbouring sites in terms of separation, setbacks, amenity and urban form'.*

5.0 Key VIA issues

The following table shows the key VIA issues identified by the planning framework.

Table 4 Key VIA issues

Part of the planning framework	Part	Issue
Environmental Planning and Assessment Act 1979	1.3 Objects of Act	Good design, amenity
Sydney Local Environmental Plan 2012	Section 1.2 'Aims of Plan'	Quality of public domain, and quality of building interfaces adjoining the public domain
	Section 4.3 'Height of buildings'	Context, height transitions, sharing of views, restricting taller buildings, and definition of the public domain
	Section 4.4 'Floor space ratio'	Desired future character and amenity
	Section 6.21C 'Design excellence'	View corridors, location of towers

Based on this, the key general issues to be considered by the VIA are:

- **Context:** responsiveness to context, including urban form
- **Character:** consistency with desired future visual character
- **View corridors:** impact on important public view corridors
- **Scale:** height and bulk of buildings, including proportions, and the location of towers
- **Amenity:** impact on visual amenity, in particular public domain visual amenity arising from building interfaces
- **Design:** demonstration of design excellence.

6.0 Method

VIA is a highly complex area that involves qualitative and professional value judgements. While there is a wealth of guidance documents, there is currently no universally agreed, national level guideline for VVIA in Australia (AILA, 2019). As noted by the Land and Environment Court of New South Wales in *Rose Bay Marina Pty Limited v Woollahra Municipal Council and anor* [2013] NSWLEC 1046 (Rose Bay), the key to addressing this challenge is to adopt a rigorous methodology.

To ensure appropriate rigour and ensure responsiveness to the SEARs, the methodology adopted by this VIA comprises two key stages:

- **Stage 1 – Visual analysis:** preparation of an evidence base of images to inform assessment
- **Stage 2 – Visual impact assessment:** assessment of visual impact.

6.1 Stage 1 – Visual analysis

The purpose of this stage is preparation of an evidence base of images to inform assessment.

In accordance with the LEC 'Use of Photomontages and Visualisation Tools Policy' (the photomontage policy) (May 2024), photos showing the existing visual condition and photomontages showing the future visual condition should the proposal be developed were prepared for 3 nearby viewpoints in the public domain.

Appendix A provides detail on this stage of the methodology.

6.2 Stage 3 – Visual and view impact assessment

The purpose of this stage is assessment of visual impact.

This stage involves the following key steps:

- assessment of the significance of the proposal's visual impact generally in accordance with the principles of the Guidelines for Landscape and Visual Impact Assessment – Third Edition (GLVIA3) as informed by the planning principle established by Moore SC and Adam SC of the LEC in their judgement in *Rose Bay Marina Pty Limited v Woollahra Municipal Council and anor* [2013] NSWLEC1046 (Rose Bay)
- assessment of consistency with relevant parts of planning framework
- consideration of mitigation measures.

The GLVIA3 is widely referenced in VVIA in Australia (AILA, 2019) and is more versatile for a range of contexts in particular those of an urban nature compared to other commonly referenced but more highly specialised guidance such as that prepared by the US Forestry Service. Where appropriate, the VVIA also has regard to other VVIA guidance including 'Topic Paper 6 – Techniques and criteria for judging capacity and sensitivity' (the Countryside Agency and Scottish Natural Heritage, 2014). While primarily guiding matters of planning and design matters, where appropriate for a VVIA consideration has also been given to the planning principles established by the LEC in *Project Venture Developments v Pittwater Council* [2005] NSWLEC 191 (Project Venture) *Veloshin v Randwick Council* [2007] NSWLEC 428 (Veloshin).

This focusses on determining the significance of the proposal's visual impact (also referred to as the level of visual impact) by combining judgements about sensitivity and magnitude.

Sensitivity of the view to the nature of change proposed

Under the GLVIA3, sensitivity is defined as (direct quote in italics):

- *'A term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor.'*

The term receptor can cause confusion. As such, in this VIA sensitivity is related to both the view itself and people who will see the view.

Judgements about sensitivity are based on the same place and people factors used in the visual analysis as follows:

Place factors:

- visual characteristics: visual characteristics, having regard to natural attributes such as topography, and human attributes such as built form
- social and cultural value: social and cultural value, having regard to attributes such as heritage items, and designation of significant views

People factors:

- number of people: the general number of people who will ordinarily see the proposal
- type of people: the prevailing type of people who will ordinarily see the proposal.

Sensitivity is not absolute. Rather, it is relative taking context into consideration. For example, a visual setting that already has particular elements within it will be less sensitive to the nature of change proposed where that change involves the insertion of a similar type to these existing elements.

The ability for a visual setting to accommodate change without unacceptably diminishing or changing valued existing character is also relevant to sensitivity. In general, complex visual settings comprising a range of different elements (eg, type, size and scale, style and the like) have greater capacity to accommodate change than those that have fewer elements.

Magnitude of the nature of change proposed

Under the GLVIA3, magnitude is defined as (direct quote in italics):

- *'A term that combines judgements about the size and scale of the effect, the extent of the area over which it occurs, whether it is reversible or irreversible and whether it is short or long term in duration.'*

Judgements about magnitude are based on 3 factors:

- size and scale: the size of the proposal and its scale relative to other elements and features in the view, the amount of change (eg, addition, loss) of elements and features in the view, the level of contrast or compatibility with existing visual character, and the potential for the visual catchment to absorb the proposal with unacceptable erosion of less of its valued characteristics / character
- geographic extent: the extent of the view occupied by the proposal
- reversibility and duration: whether the site can reasonably be restored to its condition that existed prior to the development occurring, and the length of the time the development is expected to exist (ie, short or long term).

Table 5 Factors of sensitivity and magnitude

Factors of sensitivity	Factors of magnitude
• Visual characteristics • Social and cultural value • Number of people • Type of people	• Size and scale • Geographic extent • Reversibility and duration

Significance of the proposal's visual impact

Under the GLVIA3 significance is defined as (direct quote in italics):

- *'A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic'.*

Significance is not absolute but rather relative based on how the proposal may ordinarily be perceived by people on a five-point qualitative scale:

- negligible significance of impact
- low significance of impact
- moderate significance of impact
- high significance of impact
- major significance of impact.

There is no pre-determined definition of what the difference between each of these findings. Rather, as has been noted, it is inherently subjective and varied according to the nature of each view. In this regard the GLVIA3 makes the following observation (direct quote in italics):

- *'There are no hard and fast rules about what makes a significant effect, and there cannot be a standard approach since circumstances vary with the location and context and with the type of proposal'.*

The GLVIA3 further advises that 'in making a judgement about the significance of visual effects the following points should be noted (direct quote in italics) :

- *'Effects on people who are particularly sensitive to changes in views and visual amenity are more likely to be significant*
- *Effects on people at recognised and important viewpoints or from recognised scenic routes are more likely to be significant*
- *Large-scale changes which introduce new, non-characteristic or discordant or intrusive elements into the view are more likely to be significant than small changes or changes involving features already present within the view'.*

6.2.1 Assessment of consistency with relevant parts of planning framework

Acceptability of visual impact is determined by consistency with relevant parts of the planning framework. The planning framework is the appropriate reference for this judgement as it represents the policy position of the NSW Government, and in the case of local planning instruments that of council on relevant matters.

6.2.2 Consideration of mitigation measures

Mitigation measures are used to ensure acceptable visual impact. They comprise primary mitigation measures such as siting, scale, form and massing which are integral to the proposal, and secondary measures such as materiality and colour which may form part of relevant and reasonable conditions of development consent.

6.3 Assumptions, limitations and exclusions

In addition to any others expressed in the relevant part, the following key assumptions, limitations and exclusions apply to this VIA:

6.3.1 Assumptions

- it is assumed that all inputs from other parties are accurate, including the planning and design documentation

6.3.2 Limitations

- as with all VIA, there is considerable interplay between planning, design and visual impact matters. As such, while the VIA touches on matters such as character, size and scale and amenity, due regard should be given to other relevant documents for full address of these matters
- the evidence base of images provides an indication of visual impact informed by visual analysis that is considered to be reasonable and proportion to the likely impacts of the proposal. It does not purport to represent every possible viewing condition within the visual catchment
- while imagery provides an indication of likely future visual environment, they can only provide an approximation of the rich visual experience enabled by the human eye. Limitations such as optical distortion apply (refer to **Attachment 1** for further detail)

6.3.3 Exclusions

- heritage, in particular impact on values and significance
- Aboriginal cultural heritage values and connecting with Country
- night-time impact, including lighting
- outlook
- visual privacy.

6.3.4 Documents and material relied on

In addition to any others expressed in the relevant part, the VIA has relied on the following documents and material:

- NSW Planning Portal Spatial Viewer (accessed November, 2025), NSW Government
- Spatial Information eXchange (SIX) (accessed November, 2025), NSW Government
- Nearmap (accessed November, 2025)
- Google Maps (accessed November, 2025).

6.4 Key public viewpoints in the primary visual catchment

The nature and extent of visual impact changes with a person's location in the landscape (viewpoint) based on factors such as direction, distance and angle of viewpoint and duration of visibility (eg, static or moving). As there is a near infinite number of viewpoints, a selection of viewpoints to form the basis of the VIA is required. In this regard, the GLVIA3 provides the following guidance:

- 'The viewpoints used need to cover as wide a range of situations, as is possible, reasonable and necessary to cover the likely significant effects. It is not possible to give specific guidance on the appropriate number of viewpoints since this depends on the context, the nature of the proposal and the range and location of visual receptors. The emphasis must always be on proportionality in relation to the scale and nature of the development proposal and its likely significant effects'.

As can be seen, the focus is on achieving a balance between adequacy of coverage and reasonableness. They are to be in the public domain and in the visual catchment, and should be well used and freely, easily and ordinarily accessible to the public.

The key public viewpoints in the primary visual catchment selected to inform the VIA are shown in the below table. **Attachment 1** provides a map of the location of these viewpoints.

Reasonable inferences can be drawn from assessment of these viewpoints and applied more broadly to the primary visual catchment.

Viewpoints were not selected for Green Square Plaza. Due to its physical proximity to the proposal, any photos and photomontages would not provide a high level of understanding of relevant visual impacts. In lieu of this, artist impressions of the proposal as seen from the plaza are provided in the design documentation. A number of these impressions are reproduced in this VIA.

Table 6 Key public viewpoints in the primary visual catchment

No.	Location	Reason
1.	Green Square Station	Main nearby public transport node
2.	The Drying Green	Key adjoining park
3.	Merton Street (Zetland Estate Heritage Conservation Area)	Established lower density residential area and heritage conservation area

7.0 Visual impact assessment

7.1 Viewpoint 1 Green Square Station

7.1.1 Key parameters

The following table identifies this view's key parameters.

Table 7 Viewpoint 1 Green Square Station: Key parameters

Parameter	Description
View target	South-west elevation of the proposal
Direction of view	To the east
Distance to target	60 – 65m (approx.)
Angle relative to target	Angled
Elevation relative to target	Same or similar

7.1.2 Current view



Figure 14 Viewpoint 1 Green Square Station: Current view

Source: Virtual Ideas

7.1.3 Description of the view

The foreground of this view comprises Botany Road. In this location Botany Road is a wide, 4 lane, dual direction and heavily trafficked manor through road. A fence barrier to pedestrian movement is visible separating the 2 vehicle travel directions.

The left midground comprises the large scale, distinct form of Infinity, and the centre and right midground comprises the Green Square Plaza. The distinct nature and form of the Green Square Library is visually prominent. The terraces and stepped western edge of Green Square Plaza, in particular due to its different colour and materiality to the adjoining Botany Road.

The background comprises a continuous row of tall, long higher density residential and mixed use buildings on the northern side of Ebsworth Street.

Scattered street and public domain tree plantings are visible.

7.1.4 Assessment of sensitivity to the nature of change proposed

The following table assesses the sensitivity of the viewpoint to the nature of change proposed. The viewpoint is considered to have a low sensitivity of the viewpoint to the nature of change proposed.

Table 8 Viewpoint 1 Green Square Station: Assessment of sensitivity to the nature of change proposed

Parameter	Description
Place factors	
Visual characteristics	Low. The view is a town centre context characterized by existing, larger scale, residential and non-residential built elements in the landscape.
Cultural and social value	Medium. The view encompasses part of Green Square Plaza and Green Square Library, which are culturally and socially valuable within the Green Square context.
People factors	
Type of people	Low. The view will likely ordinarily be seen by people travelling to and from public transport (Green Square Station).
Number of people	High. Due to it being aligned with a pedestrian entrance to Green Square Station, the view will likely ordinarily be seen by a high number of people.

7.1.5 Proposed view



Figure 15 Viewpoint 1 Green Square Station: Proposed view

Source: Virtual Ideas

7.1.6 Description of the change to the view

The proposal represents the insertion of large new element in the centre background of the view adjacent to and partly behind the Infinity building.

In doing so it will replace the existing vacant site, and block visibility of tall buildings in the background including Ebsworth, and part of the sky.

A number of visual features of the proposal are evident in this view, including:

- its podium and taller building form
- its multiple, well separated taller buildings
- the substantial setback of the taller building from the podium.

In this view, the proposal is seen having a scale similar to the Infinity building.

7.1.7 Assessment of the magnitude of the nature of change proposed

The following table assesses the magnitude of the nature of change proposed. The proposal is considered to represent a major change over wide area that is ongoing and irreversible. As such the proposal is considered to have a dominant magnitude of change.

Table 9 Viewpoint 1 Green Square Station: Assessment of the magnitude of the nature of change proposed

		Duration and reversibility			
		Ongoing and irreversible	Ongoing capable of being reversed	Limited life (5 – 10 years)	Limited life (< 5 years)
Size and scale of change	Major change over wide area	Dominant	Considerable	Considerable	Noticeable
	Major change over restricted area, or Moderate change over wide area	Considerable	Considerable	Noticeable	Noticeable
	Moderate change over restricted area; or Minor change over a wide area	Considerable	Noticeable	Noticeable	Perceptible
	Minor change over a restricted area; or Insignificant change	Perceptible	Perceptible	Perceptible	Imperceptible
	Imperceptible change	Imperceptible	Imperceptible	Imperceptible	Imperceptible

7.1.8 Assessment of the significance of visual impact

The following table assesses the significance of the nature of change proposed. Overall, the proposal is considered to have a moderate significance of visual impact.

Table 10 Viewpoint 1 Green Square Station: Assessment of the significance of visual impact

		Magnitude				
		Dominant	Considerable	Noticeable	Perceptible	Imperceptible
Sensitivity	High	Major	High	Moderate	Low	Negligible
	Medium	High	Moderate	Low	Low	Negligible
	Low	Moderate	Low	Low	Negligible	Negligible
	Negligible	Low	Low	Negligible	Negligible	Negligible

7.2 Viewpoint 2 The Drying Green

7.2.1 Key parameters

The following table identifies this view's key parameters.

Table 11 Viewpoint 2 The Drying Green: Key parameters

Parameter	Description
View target	South-east elevation of the proposal
Direction of view	To the north-west
Distance to target	30 - 35m (approx.)
Angle relative to target	Angled
Elevation relative to target	Same or similar

7.2.2 Current view



Figure 16 Viewpoint 2 The Drying Green: Current view

Source: Virtual Ideas

7.2.3 Description of the view

The foreground of this view comprises the western edge of the Drying Green, and Paul Street. In this location Paul Street is a standard width, 2 lane, dual direction and lightly trafficked local access street.

The midground comprises the site, the adjacent site to the south, part of Green Square Plaza and the eastern end of tall, long higher density residential and mixed use buildings on the northern side of Ebsworth Street.

The background comprises the remainder of the continuous row of tall, long higher density residential and mixed use buildings on the northern side of Ebsworth Street, as well as the large scale, distinct forms of Infinity and Ovo.

Scattered street and public domain tree plantings are visible.

7.2.4 Assessment of sensitivity to the nature of change proposed

The following table assesses the sensitivity of the viewpoint to the nature of change proposed. The viewpoint is considered to have a low sensitivity of the viewpoint to the nature of change proposed.

Table 12 Viewpoint 2 The Drying Green: Assessment of sensitivity to the nature of change proposed

Parameter	Description
Place factors	
Visual characteristics	Low. The view is a town centre context characterized by existing, larger scale, residential and non-residential built elements in the landscape.
Cultural and social value	Medium. The view encompasses part of Green Square Plaza and Green Square Library, which are culturally and socially valuable within the Green Square context.
People factors	
Type of people	Medium. The view will likely ordinarily be seen by people travelling to and from public transport (Green Square Station), as well as people engaged in outdoor active and passive recreation (The Drying Green
Number of people	High. Due to it being aligned with a main public open space and key east-west street in the town centre (Zetland Avenue), the view will likely ordinarily be seen by a high number of people.

7.2.5 Proposed view



Figure 17 Viewpoint 2 The Drying Green: Proposed view

Source: Virtual Ideas

7.2.6 Description of the change to the view

The proposal represents the insertion of large new element in the right midground of the view.

In doing so it will replace the existing vacant site, and block visibility of tall buildings in the background including Ovo, Infinity, and Ebsworth, and part of the sky.

While not part of this VIA, the proposal is intended to have a complementary relationship with future development on the adjacent site to frame the eastern edge of Green Square Plaza.

A number of visual features of the proposal are evident in this view, including:

- its podium and taller building form
- the lower rise podium located adjoining and interfacing with Green Square Plaza its multiple, well separated taller buildings
- the location of the tower as an eastern gateway to Green Square Plaza, and to demarcate the corner of Zetland Avenue and Paul Street
- the visually interesting and engaging public space facing, ground level configuration of the building, with the upper levels appearing to cantilever over its recessed form
- the use of visible line and form elements on the building façade to reduce the appearance of building bulk and scale, including balconies, curved edges, and finer grain vertical and horizontal elements.

7.2.7 Assessment of the magnitude of the nature of change proposed

The following table assesses the magnitude of the nature of change proposed. The proposal is considered to represent a major change over wide area that is ongoing and irreversible. As such the proposal is considered to have a dominant magnitude of change.

Table 13 Viewpoint 2 The Drying Green: Assessment of the magnitude of the nature of change proposed

		Duration and reversibility			
		Ongoing and irreversible	Ongoing capable of being reversed	Limited life (5 – 10 years)	Limited life (< 5 years)
Size and scale of change	Major change over wide area	Dominant	Considerable	Considerable	Noticeable
	Major change over restricted area, or Moderate change over wide area	Considerable	Considerable	Noticeable	Noticeable
	Moderate change over restricted area; or Minor change over a wide area	Considerable	Noticeable	Noticeable	Perceptible
	Minor change over a restricted area; or Insignificant change	Perceptible	Perceptible	Perceptible	Imperceptible
	Imperceptible change	Imperceptible	Imperceptible	Imperceptible	Imperceptible

7.2.8 Assessment of the significance of visual impact

The following table assesses the significance of the nature of change proposed. Overall, the proposal is considered to have a moderate significance of visual impact.

Table 14 Viewpoint 2 The Drying Green: Assessment of the significance of visual impact

		Magnitude				
		Dominant	Considerable	Noticeable	Perceptible	Imperceptible
Sensitivity	High	Major	High	Moderate	Low	Negligible
	Medium	High	Moderate	Low	Low	Negligible
	Low	Moderate	Low	Low	Negligible	Negligible
	Negligible	Low	Low	Negligible	Negligible	Negligible

7.3 Viewpoint 3 Merton Street (Zetland Estate Heritage Conservation Area)

7.3.1 Key parameters

The following table identifies this view's key parameters.

Table 15 Viewpoint 3 Merton Street (Zetland Estate Heritage Conservation Area): Key parameters

Parameter	Description
View target	North-east elevation of the proposal
Direction of view	To the south-west
Distance to target	110-120m (approx.)
Angle relative to target	Nearly flush with the north-east elevation of the proposal

Parameter	Description
Elevation relative to target	Same or similar

7.3.2 Current view



Figure 18 Viewpoint 3 Merton Street (Zetland Estate Heritage Conservation Area): Current view

Source: Virtual Ideas

7.3.3 Description of the view

The foreground of this view comprises Portman Street. In this location Portman Street is a standard width, 2 lane, dual direction and lightly trafficked local residential access street with angled parking on its western side. The raised and landscape intersection treatment with Merton Street as well as Merton Street itself is visible in the left foreground.

The midground of the view comprises single and double storey terrace housing.

The background of the view comprises tall, long higher density residential and mixed use buildings on the northern side of Ebsworth Street. In this view in the absence of vertically balancing elements, their length is emphasised. This creates a visual contrast with the smaller scale of the single and double storey terrace housing in the midground.

Street trees are a feature of this view.

7.3.4 Assessment of sensitivity to the nature of change proposed

The following table assesses the sensitivity of the viewpoint to the nature of change proposed. The viewpoint is considered to have a medium sensitivity of the viewpoint to the nature of change proposed.

Table 16 Viewpoint 3 Merton Street (Zetland Estate Heritage Conservation Area): Assessment of sensitivity to the nature of change proposed

Parameter	Description
Place factors	
Visual characteristics	Medium. While located in and in part comprising an established lower density residential area and heritage conservation area, existing, larger scale, residential and non-residential built elements are prominent in the landscape.
Cultural and social value	Medium. The view encompasses part of an established lower density residential area and heritage conservation area.
People factors	
Type of people	Medium. The view will likely ordinarily be seen by local residents travelling to and from home.
Number of people	Medium. Due to it being aligned with a local residential access street, the view will likely ordinarily be seen by a moderate number of people.

7.3.5 Proposed view



Figure 19 Viewpoint 3 Merton Street (Zetland Estate Heritage Conservation Area): Proposed view

Source: Virtual Ideas

7.3.6 Description of the change to the view

The proposal represents the insertion of large new elements in the left and centre background of the view. In doing so it will block visibility of part of the sky.

It will mainly be blocked from view by the existing large scale buildings in the midground of the view. Its relationship with these buildings, the midground and foreground creates a visually layered stepping of building massing.

The separation of the taller buildings is evident in this view.

7.3.7 Assessment of the magnitude of the nature of change proposed

The following table assesses the magnitude of the nature of change proposed. The proposal is considered to represent a moderate change over wide area that is ongoing and irreversible. As such the proposal is considered to have a considerable magnitude of change.

Table 17 Viewpoint 3 Merton Street (Zetland Estate Heritage Conservation Area): Assessment of the magnitude of the nature of change proposed

		Duration and reversibility			
		Ongoing and irreversible	Ongoing capable of being reversed	Limited life (5 – 10 years)	Limited life (< 5 years)
Size and scale of change	Major change over wide area	Dominant	Considerable	Considerable	Noticeable
	Major change over restricted area, or Moderate change over wide area	Considerable	Considerable	Noticeable	Noticeable
	Moderate change over restricted area; or Minor change over a wide area	Considerable	Noticeable	Noticeable	Perceptible
	Minor change over a restricted area; or Insignificant change	Perceptible	Perceptible	Perceptible	Imperceptible
	Imperceptible change	Imperceptible	Imperceptible	Imperceptible	Imperceptible

7.3.8 Assessment of the significance of visual impact

The following table assesses the significance of the nature of change proposed. Overall, the proposal is considered to have a moderate significance of visual impact.

Table 18 Viewpoint 3 Merton Street (Zetland Estate Heritage Conservation Area): Assessment of the significance of visual impact

		Magnitude				
		Dominant	Considerable	Noticeable	Perceptible	Imperceptible
Sensitivity	High	Major	High	Moderate	Low	Negligible
	Medium	High	Moderate	Low	Low	Negligible
	Low	Moderate	Low	Low	Negligible	Negligible
	Negligible	Low	Low	Negligible	Negligible	Negligible

7.4 Key findings

The value of the assessed views ranges from moderate to high. The value of that part of the assessed view that is impacted by the proposal compared to the approved planning proposal is low.

The assessed views are obtained across front boundaries, and may be obtained from both sitting and standing positions.

The assessed views are primarily obtained when looking south-east from a range of rooms, including living rooms. The extent of the proposal's potential view impact is shown in the following table.

Table 19 The extent of the proposal's view impact

Viewpoint	Location	Sensitivity	Magnitude	Significance
1.	Green Square Station	Low	Dominant	Moderate
2.	The Drying Green	Low	Dominant	Moderate
3.	Merton Street (Zetland Estate Heritage Conservation Area):	Medium	Considerable	Moderate

8.0 Discussion of key issues

8.1 Context and urban form

Under this issue, the planning framework requires consideration of responsiveness to context, including urban form.

8.1.1 Green Square Town Centre

As has been noted, contextually the site forms a key part of the Green Square Town Centre. The Green Square Town Centre is the designated key centre for the broader Green Square Renewal Area.

As is evidenced by the photos included in this VIA, the local Green Square context is highly urban, being characterized by existing, larger scale, residential and non-residential built elements and features. This character will continue to be strengthened as the current built footprint of taller buildings in the town centre expands and consolidates.

The photomontages show the proposal as being compatible and integrating with this context.

Of note as is outlined in the design documentation, the height of the podium part of the proposal has been aligned with that of the Infinity building to the west as a key design move in terms of responsiveness to context.

8.1.2 Urban form

In terms of urban form, the proposal has benefits at a number of scales:

- local scale: the proposal strengthens the urban form legibility of the Green Square Town Centre as the main centre for the broader Green Square Renewal Area.
- district scale: the proposal strengthens the polycentric visual character of the south Sydney part of the Eastern Economic Corridor where tall buildings first appear north of the site in Redfern and continue in well-planned clusters to Mascot to the south.
- metropolitan scale: the proposal is consistent with the prevailing and well-established urban form characteristic of Greater Sydney, and in particular the Eastern City District in which the site is located, of clusters of taller buildings in higher rise nodes surrounded by lower rise development.

8.1.3 Zetland Estate HCA

The site is located close to heritage items and the Zetland Estate HCA. New built form is physically separated from the Zetland Estate HCA. While visible from the HCA, as is seen in the photomontage prepared for

viewpoint 3, the proposal does not present as visually overbearing or overwhelming from the HCA. This is primarily due to it being screened by and seen in association with other tall building located closer to the HCA on the northern side of Ebsworth Street.

8.2 Character

Under this issue, the planning framework requires consideration consistency with desired future visual character.

The proposal is consistent with the site and area's desired future visual character dominated by larger scale, higher rise, high density residential focussed mixed-use development.

In addition, it is also consistent with more fine grain aspects of this desired future visual character such as a positive relationship between the public and private domains through measures such as lower rise street walls, and active frontages in key locations.

8.3 View corridors

Under this issue, the planning framework requires consideration of impact on important public view corridors.

Together with future development on the southern side of Green Square Plaza, the proposal will define and enclose the plaza as the main public space in the town centre. This is considered to be a significant improvement in the visual quality of the plaza compared to its current poorly defined, amorphous nature.

Furthermore, the proposal will retain a physical and visual connection between the Green Square train station at the west of the town centre, through Green Square Plaza and the Drying Green, to Zetland Avenue at the eastern end of the town centre (refer below figure).



Figure 20 Landscape concept showing the proposal's relationship with surrounding public spaces

Source: Design team

8.4 Scale

Under this issue, the planning framework requires consideration of the height and bulk of buildings, including proportions, and the location of towers.

As is evidenced by the photomontages included in this VIA, the height and bulk of the proposal is consistent with reasonable expectations established by the strategic and statutory planning frameworks, and is compatible with its context.

For example, as is shown by the photomontage for viewpoint 1 when seen from locations to the west the proposal will be seen in the context of the large scale and visually distinct Infinity and Ovo buildings. This view also shows how the proposal's podium and tower form, including the considerable setback of the towers from the south-west edge of the podium closest to Green Square Plaza, mediates and reduces the perception of scale.

While not appearing directly in the context of these buildings in views from the east as shown in the photomontage for viewpoint 2, it will nonetheless be seen together with other, larger scale buildings in the town centre. Furthermore, a greater scale is contextually appropriate due to its strategic location marking Green Square Plaza as the public space core of the town centre, and its eastern threshold demarcated by the intersection of Zetland Avenue and Paul Street.

As is shown in the photomontage for viewpoint 3 and discussed above, the proposal does not present at unduly prominent scale when seen from the north from the Zetland Estates HCA.

8.5 Amenity

Under this issue, the planning framework requires consideration of impact on visual amenity, in particular public domain visual amenity arising from building interfaces

The proposal represents a considerable improvement to the visual amenity of the public domain under its current visual condition as a vacant site.

As is noted above, the proposal also improves the amenity of Green Square Plaza through the proposed improvements to definition and enclosure. Importantly, this outcome is achieved primarily through a more human scaled podium form. It is also intended that the public space facing ground floor of the proposal incorporates active uses to contribute further to the visual amenity of Green Square Plaza, as well as Ebsworth Street.

The proposal reinforces and strengthens the emerging high street character of Ebsworth Street through a range of measures, including defining its southern edge (refer figure below), providing active uses at its street facing ground level, and including a 'prominent building' on Site 18 at the eastern edge of the precinct that will delineate its eastern entrance.



Figure 21 Artist impression of the proposal seen from Green Square Plaza

Source: Design team



Figure 22 Artist impression of the proposal seen from Ebsworth Street

Source: Design team

8.5.1 View loss and view sharing

Views across and over the site may be obtained from some more elevated locations in the nearby private domain.

This may include higher value views to part of the Sydney CBD skyline from locations to the south (while noting the likely considerable blocking effect of Ebsworth, Infinity, and Ovo), and moderate value district views from other directions.

Due to the location of the site and its context in an evolving, major growth area in the form of Green Square Town Centre and the distance and multiple properties over which these views are obtained, these views are highly vulnerable to change and it is reasonable to expect a relatively high level of change to their extent and nature. This includes the full or partial obstruction of elements and features.

In addition, the proposal is reasonable within its context, and has been the subject of a design review process.

As such, any impact on existing views obtained from the private domain is considered acceptable.

While other amenity considerations are not directly relevant to VIA, they do inform considerations about the acceptability of the scale of development. In this regard it is understood the proposal performs well relative to controls for solar access to public open space, wide safety and comfort, and Apartment Design Guide (ADG) requirements for internal amenity.

8.6 Design

Under this issue, the planning framework requires demonstration of design excellence.

As is shown in the planning and design documentation, the proposal represents the outcome of a considered design process. This has included:

- comprehensive and detailed site and context analysis
- consideration of connecting with Country narratives
- address of Better Placed (GANSW, 2017)
- consideration of macro and micro design principles, including 'the importance of Green Square and The Drying Green as an urban respite', and 'create active urban edges'
- the leading design practices of FK and Plus Studio working together.

The resultant design of the proposal provides for:

- a positive visual scale relationship to Green Square Plaza by the more human scale podium
- high levels of visual amenity for pedestrians, including through the creation of the multiple through site links and associated provision of ground level active frontages
- visual interest through the varied yet cohesive overall built form composition
- a range of finer grain measures that help reduce the appearance of building bulk and scale as is shown in the below figure
- visual filtering through opportunities for additional tree plantings
- high quality materiality and colour.



Figure 23 Artist impression of the base of the proposed building on Block 18

Source: Design team

9.0 Mitigation measures

There are three broad types of mitigation measures:

1. avoid
2. minimise

3. offset.

This is generally consistent with the principles for the management of environmental impacts in the GLVIA3.

Under the GLVIA3, there are a number of stages in the development process when mitigation measures should be considered. Of relevance to this proposal are the following:

- **primary measures:** considered as part of design development
- **secondary measures:** considered as part of conditioning a development consent.

As has been outlined in the planning documentation, the proposal has been the subject to a design process that has included consideration of visual impact. This has resulted in the incorporation of a number of primary measures that seek to avoid and minimise any potential significant adverse visual impacts.

The incorporation of these mitigation measures have been critical to the determination of acceptable visual impact. On this basis, it is not considered necessary to make further fundamental or otherwise large-scale amendments to the proposal in its current form to satisfactorily manage visual impact.

10.0 Conclusion

The VIA has found that primary design measures relating to siting and layout, size and scale, and form and massing adequately mitigate the visual impact of the proposal. As such, additional fundamental or large-scale mitigation measures are not considered necessary.

While acknowledging that the proposal will have a visual impact, overall on the balance of relevant considerations this impact is considered acceptable. .

In terms of broader planning grounds, the proposal:

- furthers the objects of the EP&A Act 1979, including promoting ecologically sustainable development in particular through promoting intergenerational equity as it relates to access to housing
- is consistent with the National Housing Accord and current government planning priorities, delivering a greater amount and choice of new homes, including more affordable homes in a BTR arrangement
- is consistent with the strategic planning framework and section 9.1 directions, locating new homes in a well located part of the exiting urban area, in this instance the Green Square Town Centre, adjacent to Green Square Station and bus routes, and adjoining Green Square Plaza as the heart of the town centre
- is consistent with section 4.15 of the EP&A Act, the site is highly suited to the proposal due to its large size which enables impacts to be better managed without unacceptable adverse impact on other land.

In terms of visual impact grounds, the proposal:

- has a magnitude and significance of visual impact that is consistent with the reasonable expectations established for the site by the planning framework
- is responsive to its strategic visual context, strengthening the urban form legibility of the Green Square Town Centre
- is consistent with the existing and emerging prevailing visual character of Green Square Town Centre dominated by larger scale, higher rise, residential focussed mixed use buildings, and finer grain visual elements such as being built to adjoining street alignments
- does not impact designated important public view corridors
- will better define and enclose Green Square Plaza and the Drying Green
- has a height and bulk compatible with nearby and other buildings in Green Square Town Centre

- will not be visually overwhelming or overbearing when seen from, or in the context of, the adjoining Green Square Plaza and the Drying Green
- enhances the amenity of Green Square Plaza, the Drying Green and the town centre more generally through measures such as a permeable network of public spaces, deep soil plantings, active and high quality street frontages, a podium that mediates the visual impact of taller buildings, well separated buildings, and an overall distinct, varied but visually cohesive composition
- exhibits design excellence, including through high quality materiality and colour.

As such, it is the conclusion of the VIA that the proposal can be supported on visual impact grounds.

Appendix 1: Visual impact evidence



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