Planning Submission

SSD-83899206 – Green Square Town Centre Stage 3
Sites 7, 17 and 18 – 960A Bourke Street, Zetland

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1. Introduction

This submission relates to the State Significant Development Application (SSD-83899206) and concurrent rezoning for Stage 3 of the Green Square Town Centre, comprising Sites 7, 17 and 18 at 960A Bourke Street, Zetland.

This submission assesses the proposal against the **previously approved development outcomes** for the site and focuses on the **material escalation in development intensity** arising from the proposal, specifically:

- increases in **building height** relative to approved schemes;
- a substantial uplift in **floor space ratio (FSR)**;
- a pronounced increase in **residential dwelling numbers and population density**; and
- reliance on **economic viability** as the primary justification for these increases, without transparent or comparative analysis.

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2. Approved Development Context (Baseline)

2.1 Previously Approved Building Heights

Document 1 identifies the last approved and assessed building envelopes for the subject sites as follows:

- **Development Application D/2017/564** approved:
    - a **16-storey mixed-use building at Site 7**, and
    - a **13-storey mixed-use building at Site 17**.
- **Development Application D/2017/503** approved:
    - a **20-storey mixed-use residential building at Site 18**.

These approvals represent the **established and assessed built-form outcome** for Stage 3 of the Green Square Town Centre and form the appropriate reference point for evaluating subsequent proposals.

2.2 Previously Approved Residential Yield

The earlier approvals reflect a **moderate residential yield within a mixed-use framework**:

- **Site 18 (D/2017/503)** explicitly approved **103 residential apartments**.

- **Sites 7 and 17 (D/2017/564)** were approved as **genuinely mixed-use developments**, incorporating:
    - retail,
    - commercial,
    - entertainment (cinema), and
    - residential uses.

While specific dwelling numbers are not stated for Sites 7 and 17, the approved mix necessarily constrained residential density when compared with a predominantly residential scheme.

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3. Proposed Development (SSD and Rezoning)

3.1 Proposed Building Heights

The current SSD and rezoning proposal seeks approval for three predominantly residential buildings with the following heights:

- **Site 7: 20 storeys**
- **Site 17: 20 storeys**
- **Site 18: 21 storeys**

3.2 Proposed Floor Space Ratio

The proposal seeks to amend the Green Square LEP to permit:

- an increase in FSR from **5.47:1 to 7.63:1**,

representing a **substantial uplift in permissible built floor area** across the site.

3.3 Proposed Dwelling Yield

The SSD proposes:

- a total of **511 build-to-rent apartments** across Sites 7, 17 and 18,
- including **60 affordable rental dwellings**.

This represents a **predominantly residential outcome**, with non-residential uses largely limited to ground-level activation.

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4. Comparative Assessment

4.1 Increase in Building Heights

When compared with the previously approved schemes, the proposal results in the following height increases:

Site	Approved Height	Proposed Height	Increase
Site 7	16 storeys	20 storeys	**+4 storeys**
Site 17	13 storeys	20 storeys	**+7 storeys**
Site 18	20 storeys	21 storeys	**+1 storey**

The increase at **Site 17** is particularly pronounced, representing a major escalation relative to the scale previously approved and assessed for that site.

4.2 Increase in Floor Space and Built-Form Intensity

The uplift from **5.47:1 to 7.63:1 FSR** materially increases:

- overall built bulk and massing;
- visual dominance within the Green Square Town Centre;
- cumulative impacts on public domain spaces and surrounding development; and
- the intensity of site occupation.

This increase is enabled **only through rezoning**, rather than compliance with the existing statutory planning controls.

4.3 Increase in Residential Yield and Population Density

The proposal represents a substantial escalation in residential intensity:

- from an approved **103 dwellings at Site 18**, and
- a **moderate, mixed-use residential outcome** at Sites 7 and 17,

to a **combined total of 511 dwellings across the three sites**.

The scale of change is evident:

- residential yield becomes the **dominant driver of built form**;
- population density is significantly increased; and
- demand on infrastructure, public domain and local amenity is materially intensified.

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5. Economic Viability as the Stated Justification

5.1 Applicant's Rationale

The EIS and Rezoning Statement relies on **economic viability** as the primary justification for:

- increased building heights,
- uplifted floor space ratio, and

- substantially increased dwelling numbers.

5.2 Absence of Comparative Viability Analysis

While viability is relied upon as a central justification, the submission does **not provide a comparative analysis** between:

- the **previously approved schemes** (16, 13 and 20 storeys in a mixed-use format), and
- the **current proposal** (20, 20 and 21 storeys with a predominantly residential outcome).

In particular, the submission does not demonstrate:

- whether the previously approved schemes were economically unviable;
- the magnitude of any alleged viability gap;
- what market or cost conditions have changed since those approvals; or
- why smaller or graduated increases in height, FSR or dwelling yield would not address viability concerns.

5.3 One-Dimensional Framing of Viability

The viability argument is presented in a **one-dimensional manner**, equating economic feasibility solely with **increased scale and density**.

There is no substantive examination of:

- alternative built-form outcomes within approved height envelopes;
- redistribution of residential and non-residential floor space;
- staged delivery or phasing options; or
- cost-side efficiencies that do not rely on planning control uplift.

As a result, increased height and density are treated as the **only solution**, rather than one of several potential development responses.

5.4 Planning Significance and Need for Re-Examination

Economic viability can be a relevant planning consideration; however, it must be:

- transparently demonstrated,
- proportionate to the uplift sought, and
- tested against **reasonable, previously endorsed development scenarios**.

Given the magnitude of the proposed uplift, the economic viability argument should be **re-visited by the applicant** to include:

- a clear comparison with previously approved schemes;

- identification of the specific viability issue relied upon;
- justification for why lesser or more graduated increases would be insufficient; and
- consideration of alternative responses not dependent on wholesale increases in height, FSR and dwelling yield.

Without this, the viability justification remains **asserted rather than demonstrated**, and limited weight can be afforded to it.

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6. Planning Balance and Conclusion

Taken collectively, the proposed increases in:

- building height (particularly at Sites 7 and 17),
- floor space ratio, and
- residential dwelling numbers,

constitute a **step-change in development intensity**, not an incremental refinement of previously approved outcomes.

These changes are justified primarily on economic grounds that have **not been robustly tested** against the approved baseline schemes that define the site's acceptable scale.

In the absence of a transparent and comparative viability assessment, the planning balance weighs against granting such substantial departures from the established development envelope for Sites 7, 17 and 18.

For these reasons, the proposal warrants refusal or, at a minimum, substantial amendment to ensure that height, density and residential yield are proportionate, justified, and consistent with the planning framework and previously approved development outcomes.