

To Whom It May Concern,

NSW Department of Planning, Housing and Infrastructure
City of Sydney Council

COMMUNITY SUBMISSION

Mixed Use Development at Green Square Town Centre

Sites 7, 17 and 18 | Sites 8 and 19

960A Bourke Street, Zetland & 411 Botany Road / 6 Geddes Avenue, Zetland

1. Introduction

I am a local resident living in close proximity to the Green Square Town Centre and am writing to formally object to, and request significant modifications of, two concurrent State Significant Development proposals submitted by Mirvac: the Mixed Use Development at Green Square Town Centre — Sites 7, 17 and 18, and the Mixed Use Development at Green Square Town Centre — Sites 8 and 19.

While I am broadly supportive of the ongoing transformation of Green Square and recognise the need to deliver housing supply in well-located urban renewal precincts, the community has serious concerns that both proposals, as currently designed, are incompatible with the character, amenity and liveability of this precinct. The cumulative impact of these developments — in terms of building bulk, height, wind impacts, restricted pedestrian spaces, inadequate setbacks, and critically insufficient retail activation — demands urgent reconsideration before either application is approved.

I strongly request that the Department of Planning, Housing and Infrastructure and the City of Sydney give careful and independent weight to the concerns raised below, particularly where these proposals seek to exceed existing planning controls.

2. Heritage Conservation Area: Unacceptable Visual Impact from Portman Street

The proposed buildings on Sites 7, 17 and 18 pose a direct and severe threat to the visual amenity of the Zetland Estate Heritage Conservation Area, particularly as experienced from Portman Street.

Figure 19 of the Visual Impact Assessment submitted as part of the Sites 7, 17 and 18 application (Viewpoint 3: Merton Street — Zetland Estate Heritage Conservation Area) makes the impact of this development plainly visible. The proposed towers, including the Stage 3 and future Stage 4/5 components, will rise clearly above and behind the existing heritage streetscape of low-scale Victorian and Federation-era terrace houses. The cumulative effect is visually overwhelming: the proposed built form intrudes aggressively into sightlines that currently afford heritage properties a relatively open sky backdrop.

The Zetland Estate Heritage Conservation Area is a sensitive and irreplaceable part of Sydney's built heritage. Its visual integrity depends on development in the surrounding precinct maintaining a respectful scale relationship with the historic street pattern and building heights. The proposed buildings, as shown in Figure 19, demonstrably fail this test.

I call on the Department to require the following:

- Building heights on Sites 7 and 17 be reduced by a minimum of four (4) storeys so that their rooflines are not visible from the Portman Street / Merton Street viewpoint. This is the minimum reduction required to avoid the visually overwhelming outcome illustrated in Figure 19 of the Visual Impact Assessment.
- The applicant be required to submit further heritage viewpoint analysis from additional vantage points within the Zetland Estate Heritage Conservation Area to test a full range of impacts across different streets and sight angles.
- Any approval conditions include a binding obligation that finished building heights, as constructed, will not exceed the sightlines established by a revised heritage impact assessment.

The protection of heritage conservation areas from overdevelopment in their immediate backdrop is not a discretionary consideration — it is a fundamental obligation under both the Heritage Act 1977 and the relevant environmental planning instruments. The current proposal does not meet that obligation.

3. Visual and Physical Character of Green Square Plaza: Inappropriate Bulk (Sites 7, 17, 18, 8 and 19)

Green Square Plaza, including the celebrated underground library, represents a significant public investment in civic infrastructure. It is a place of community identity and should remain legible, approachable and human in scale. The proposals for Sites 7, 17 and 18 — and the adjacent Site 8 and 19 proposal — would severely undermine this character.

Figure 15 of the Visual Impact Assessment for Sites 7, 17 and 18 (Viewpoint 1: Green Square Station) illustrates the problem clearly. The proposed development adds a substantial wall of built form that bears down on the civic plaza, diminishing the open, welcoming character of the space as experienced by pedestrians arriving at the station or approaching from Botany Road. The massing creates a canyon-like enclosure that is disproportionate to the plaza's scale and directly at odds with the intent of the precinct's public domain design.

These proposals do not create an environment where the plaza is enhanced by its built edges; they overwhelm it. Residents, workers and visitors approaching the library, station or open space areas should feel welcomed into an active and human-scale precinct — not dwarfed by an unbroken wall of residential and commercial podium.

I request that:

- The footprints of Sites 7, 17 and 18 be meaningfully reduced — particularly at their lower podium levels — to ensure the relationship with the plaza is more open and appropriately scaled.

- The design of all buildings directly fronting Green Square Plaza prioritise ground-level permeability, active edges and setbacks that maintain a generous civic margin around the library and station entry.
- The applicant demonstrate through updated viewpoint analysis how the revised massing responds to Figure 15 concerns before any approval is granted.

The same concern applies with equal force to Sites 8 and 19. These sites sit directly on the southern edge of Green Square Plaza and, as currently proposed, will present a continuous and imposing wall of built form along the plaza's most prominent frontage. Rather than framing the plaza in a manner that activates and celebrates the public space, the massing of Sites 8 and 19 dominates and encloses it. The bulk at podium and lower tower levels is excessive relative to the plaza's dimensions and will create a sense of being hemmed in — undermining the open, civic quality that was central to the original vision for the Green Square Town Centre. The design of Sites 8 and 19 must be fundamentally reconsidered to ensure the plaza retains its character as a genuine public heart, not a residual space between towers.

4. Site 19A: Unacceptable Impact on the Drying Green

Site 19A raises a distinct and serious concern that warrants separate consideration. The proposed tower on this site will have a severe and lasting impact on the Drying Green — one of the few genuine open green spaces in the Green Square Town Centre precinct and a space that is already underperforming in terms of its practical usability and community activation.

Figure 18 of the Visual Impact Assessment submitted for Sites 8 and 19 (Viewpoint 2: The Drying Green) makes the scale of this impact unmistakably clear. The proposed Site 19A tower dominates the view from the Drying Green entirely, rising as an overwhelming vertical mass that will block a significant amount of direct sunlight reaching the open space for substantial portions of the day. A green space that receives limited sunlight ceases to function as a meaningful recreational and restorative amenity for residents. The Drying Green's existing design challenges — including its impractical slanted topography — are already a barrier to effective community use; removing its access to adequate sunlight will render it functionally unusable for much of the year.

Beyond sunlight, the sheer scale of Site 19A will detract from the amenity and visual character of the Drying Green as an open, leafy and relatively intimate precinct space. The greenery and landscape established in and around the Drying Green provides an essential counterpoint to the hard, urban character of the wider town centre. A tower of the proposed dimensions on Site 19A will visually overwhelm this landscape from virtually every vantage point within the open space, fundamentally altering the character and feel of the area from a green respite to a shadowed enclosure.

The scale of Site 19A is far too significant and must be reduced substantially. I submit that:

- The height of Site 19A be significantly reduced — by a minimum of six to eight storeys — so that the tower does not cast extended shadow across the Drying Green during the morning and afternoon hours when the space is most likely to be used by residents and families.
- A detailed solar access and overshadowing study be submitted and publicly exhibited, clearly demonstrating shadow impacts on the Drying Green at hourly intervals across equinox and

solstice days. The minimum solar access standard applicable to the Drying Green must be met as a mandatory — not discretionary — planning requirement.

- The design of Site 19A be made more sympathetic to its open space setting, with a reduced and articulated footprint, greater setbacks from the Drying Green boundary, and a material and landscape treatment that complements rather than overwhelms the greenery of the surrounding area.

It's worth highlighting that this will also impact neighbouring Green Square Public School (that has a vantage point looking out west across the Drying Green). The line of sight will be the large tower of 19A and this will detract from the views available from the public school.

5. Site 18: Excessive Height on a Constrained Corner Site

Site 18 occupies a narrow corner parcel within the overall Sites 7, 17 and 18 amalgamation. Its physical dimensions, as confirmed in the DCP for the Green Square Town Centre, make it one of the more constrained sites in the precinct. The DCP originally contemplated a maximum of 18 storeys on this site. The current proposal at 20-21 storeys already exceeds this, and the recently revised application has further intensified the upper levels with additional penthouse floors.

A 20-storey-plus tower on a narrow corner site is architecturally and urbanistically inappropriate. It creates an isolated and out-of-scale finger of height that does not contribute positively to the skyline, creates poor amenity outcomes for occupants, and generates wind and shadow impacts disproportionate to its constrained footprint.

I strongly submit that Site 18 be developed with significantly fewer storeys — a reduction of at least four to five storeys from the proposed height — to bring it into proportion with its site area and its role in the precinct. A building of reduced height could still deliver meaningful residential yield while producing a far superior urban design outcome.

6. Wind Impacts and Pedestrian Safety Around Ebsworth Street

The area around Ebsworth Street and the internal pedestrian links through the Green Square Town Centre already experiences significant and persistent wind impacts that regularly disrupt pedestrian movement and amenity. This is not a hypothetical future risk — it is an existing and well-documented problem affecting the daily experience of residents, workers and visitors throughout the precinct.

The proposed layout of Sites 7, 17 and 18, with buildings positioned in close proximity to one another and to existing built form, will dramatically worsen this situation. The narrow separations between the proposed buildings will create Venturi effect wind acceleration through the gaps, channelling high-velocity air through the very pedestrian spaces that residents and visitors rely on most.

This is a safety issue, not merely a comfort issue. High pedestrian wind speeds around building gaps pose genuine risk — particularly for children, older people and people with mobility impairments. The current proposal has not adequately demonstrated that wind conditions in the internal pedestrian links and public domain areas will remain within safe and acceptable limits following construction.

I request that:

- The applicant submit a comprehensive pedestrian wind comfort and safety assessment, including post-construction modelling that accounts for cumulative wind impacts from Sites 7, 17 and 18 together with Sites 8 and 19, and existing buildings in the precinct.
- Building setbacks from boundaries be meaningfully increased so that separation distances between buildings are sufficient to avoid dangerous wind acceleration in pedestrian areas. Where necessary, building heights must be reduced to achieve safe wind outcomes.
- Greater open green space be incorporated within and between the sites to provide wind buffering and to allow prevailing winds to dissipate before reaching pedestrian pathways. The current balance between built form and open space within the precinct is inadequate and must be corrected.
- The currently planned open space — including the Drying Green — be reviewed and redesigned to function more effectively as recreational and wind-buffering space. The Drying Green's steeply slanted topography renders large portions of it impractical for everyday community use, limiting its value as an amenity. Any new open space contributions from the proposed developments must avoid repeating this design failure.

There needs to be a genuine commitment from the developer and the approving authority to prioritise pedestrian safety and open space quality over the maximisation of built form yield.

7. Retail Activation: Fundamentally Inadequate for a Town Centre of This Scale

One of the most significant and longstanding failures of the Green Square Town Centre has been the inadequate delivery of meaningful retail and community infrastructure relative to the scale of the residential population being created. Both proposals before the Department continue and entrench this failure.

The retail offering across the sites — limited to small-format ground-floor tenancies — is wholly insufficient to serve the precinct's rapidly growing residential population. There is currently no viable large-format grocery option within the town centre. A full-line supermarket — such as Harris Farm Markets or equivalent — is simply not achievable within the constrained retail floor areas proposed. Small convenience-format tenancies scattered at ground level do not constitute a functioning town centre retail core.

This is not a minor gap in the development program. Access to fresh food, daily groceries and essential services within walkable distance is a fundamental component of urban liveability. Green Square's residential population already exceeds what the current retail provision can adequately serve, and further towers will worsen this imbalance dramatically.

I submit that the following changes are essential:

- At least one dedicated basement or lower ground retail level be provided within the Sites 8 and 19 development (adjacent to Botany Rd), specifically designed and sized to accommodate a large-format grocery retailer (minimum 1,500-2,000 sqm of contiguous retail floor space). This may require reduced parking provision, which is an appropriate trade-off given the precinct's excellent public transport access. Site 8 is more appropriate for a large Retail space than Sites 7, 17 and 18 because it sits on the outer edge of Green Square and will

avoid traffic coming into the middle of the town centre where roads are not equipped to handle traffic.

- The retail component of Sites 8 and 19, which occupy a prominent position at the southern edge of Green Square Plaza, must be substantially expanded beyond the currently proposed ground-floor-only offering. Given the proximity to the station and plaza, these sites represent an unparalleled opportunity to create a genuinely activated commercial podium.
- Both applications include commitments to lease retail space to independent or community-oriented operators (which I am supportive of), not solely to high-turnover food and beverage chains. The current retail environment skews heavily toward ephemeral hospitality tenancies that do not fulfil the function of a true neighbourhood town centre.
- Community facilities and flexible community spaces be incorporated at the podium levels of Sites 7 and/or 17, in recognition of the inadequate provision of accessible community infrastructure in the immediate precinct.

The activation and liveability of Green Square depends on getting retail and community uses right. Approving further residential density without a binding requirement to deliver adequate retail floor space — at the scale necessary to support a full-line grocery offer — is a fundamental planning failure that will have lasting consequences for the quality of life of thousands of residents.

8. Geddes Avenue: Direct Traffic West of Green Square

One major issue with the development is that it does not address the current constraint of Geddes Ave not allowing traffic to exit west out of the town centre (due to this being pedestrian and cycleway), and is only providing options to turn left or right onto Botany Rd.

With the significant amount of residents (and vehicles) that will impact the area from the five new sites, there needs to be a change in the way traffic is handled to flow this out of the town centre with an additional option to connect Geddes Ave to Ngamuru Ave through to Bowden St.

The below image shows one proposal with how traffic can be directed out of the town centre (one-way), otherwise without this, it will add to the significant bottlenecks on Botany Rd.



Figure 12 Site plan
Source: Mirvac Design

I request that a traffic assessment be performed to determine the viability of such a change. Despite Ngamuru Ave having been established, this area is still not developed and therefore it is timely to address the traffic issue by having a one-way road that connects Geddes Ave to Bowden St. This will also allow traffic to more easily access the M8 and spread the traffic load in the Alexandria area.

9. Summary of Key Requested Amendments

In summary, I request that the following amendments be required as conditions of any approval, or that the applications be refused and resubmitted in revised form:

- Reduce the heights of buildings on Sites 7 and 17 by a minimum of four storeys to prevent intrusion into sightlines from the Zetland Estate Heritage Conservation Area (as demonstrated in Figure 19 of the Visual Impact Assessment).
- Reduce the footprint and massing of all buildings fronting Green Square Plaza to preserve the civic and human-scale character of this precinct (as demonstrated in Figure 15 of the Visual Impact Assessment).
- Reduce the height of the Site 18 tower by a minimum of four to five storeys to reflect the constrained nature of this corner site.
- Significantly reduce the height of the Site 19A tower (by a minimum of six to eight storeys) and increase its setback from the Drying Green boundary to prevent overshadowing of the open space and preserve the leafy, accessible character of the area (as demonstrated in Figure 18 of the Visual Impact Assessment for Sites 8 and 19).
- Increase setback distances between buildings and provide additional open green space to reduce dangerous pedestrian wind conditions around Ebsworth Street and the internal pedestrian links.

- Commission and publicly exhibit a comprehensive cumulative wind comfort and safety assessment for Sites 7, 17, 18, 8 and 19 together.
- Require the provision of at least one basement or lower-ground retail level capable of accommodating a large-format grocery retailer (minimum 1,500 sqm contiguous floor area) as part of Site 8A or 8B.
- Substantially expand the retail and community floor space component of Sites 8 and 19 at ground and podium levels.
- Review and redesign open space contributions to ensure practical usability, avoiding the design failures of the existing Drying Green.
- Introduce a one-way road that connects Geddes Ave through to Bowden St (via Ngamuru Ave) to manage the increased traffic and provide ways for motorists to exit the town centre without putting additional strain on Botany Rd.

10. Conclusion

Green Square has the potential to become one of Sydney's finest inner-city neighbourhoods. The substantial public investment in civic infrastructure — the library, the station, the plaza, the community facilities — deserves to be complemented by private development that enhances rather than overwhelms the precinct.

As currently proposed, these two applications prioritise residential yield and floor space ratio maximisation at the direct expense of heritage protection, open space, wind safety, pedestrian amenity and retail liveability. This is not an acceptable outcome for the existing and future community of Green Square.

I respectfully but firmly urge the Department of Planning, Housing and Infrastructure and the City of Sydney to require the significant amendments detailed in this submission before any approval is granted for either application.

I am available to discuss these concerns further if required and would welcome the opportunity to participate in any public hearing process relating to these applications.

Yours sincerely,

Local Resident

On behalf of the local Zetland community (Portman St)

This submission relates to the following applications on the NSW Planning Portal:

Mixed Use Development at Green Square Town Centre — Sites 7, 17 and 18

Mixed Use Development at Green Square Town Centre — Sites 8 and 19

NSW Planning Portal — planningportal.nsw.gov.au