

Memo

TO	Mr Nick Couloumbis - Toohey Miller
FROM	GBA Heritage
DATE	20 May 2026
PROJECT	160 Oxford Street Paddington
RE	SSD 97528708 HNSW Agency Submission -

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This Memo responds to the HNSW Agency Submission (NSW DCCEEW, as delegate of the Heritage Council of NSW) with regard to SS 97528708, a residential redevelopment of 160 Oxford Street, Paddington.

The HNSW Submission concentrated on the protecting the heritage values of the Victoria Barracks complex, directly to the south across Oxford Street.

The submission identified a series of reports that were attached as appendices to the Environmental Impact Statement that was submitted for the SSD.

This current memo is familiar with these nominated appendices. GBA Heritage prepared Appendices K and II.

In addition to these documents, the following additional documents have been accessed and have provided useful historical information and heritage management assessments:

- *Victoria Barracks Paddington, Conservation Analysis and Draft Conservation Policy arising out of the Statement of Conservation Policy*, Clive Lucas & Partners Pty Ltd, November 1983 (CLSP)
- *Victoria Barracks Paddington, Conservation & Heritage Management Plan*, Graham Brooks and Associates Heritage Consultants, July 2003 (GBA 2003)

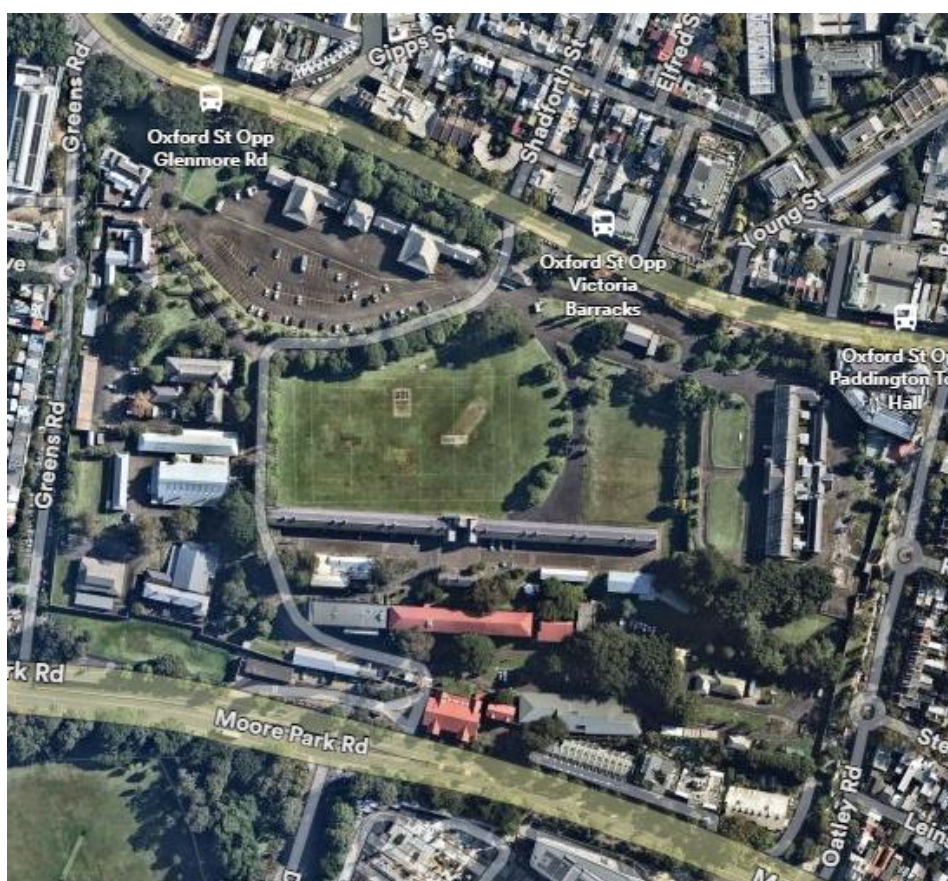
It should be noted that research reports prepared by Clive Lucas & Partners is generally regarded as being thorough and credible. GBA Heritage recognises this quality as a worthy source of information for the preparation of this memo. It also stands by its own analysis of the historic and evolved military cultural landscape in the July 2003 document.

The HNSW submission included the following request for information

*The SSD site is in close proximity to Victoria Barrack, which has been assessed as having State Significance. Victoria Barracks Precinct is listed on the Commonwealth Heritage List (CHL) and there are several individual CHL listings for building, area and structures that are part of the barracks. In order to complete our advice regarding potential impacts to Victoria Barracks we recommend that the Department request the proponent to provide the additional information as outlined in **Attachment A** prior to considering determination*



Figs 1 and 2
Aerial photos 1943 and 2026



HNSW - ATTACHMENT A REQUEST NO.1

The SOHI notes that there will be partial overshadowing of Victoria Barracks Buildings 95 and 96 in mid-winter. We request that the proponent provide additional information on the significance of these buildings and assess how the overshadowing would impact their significance

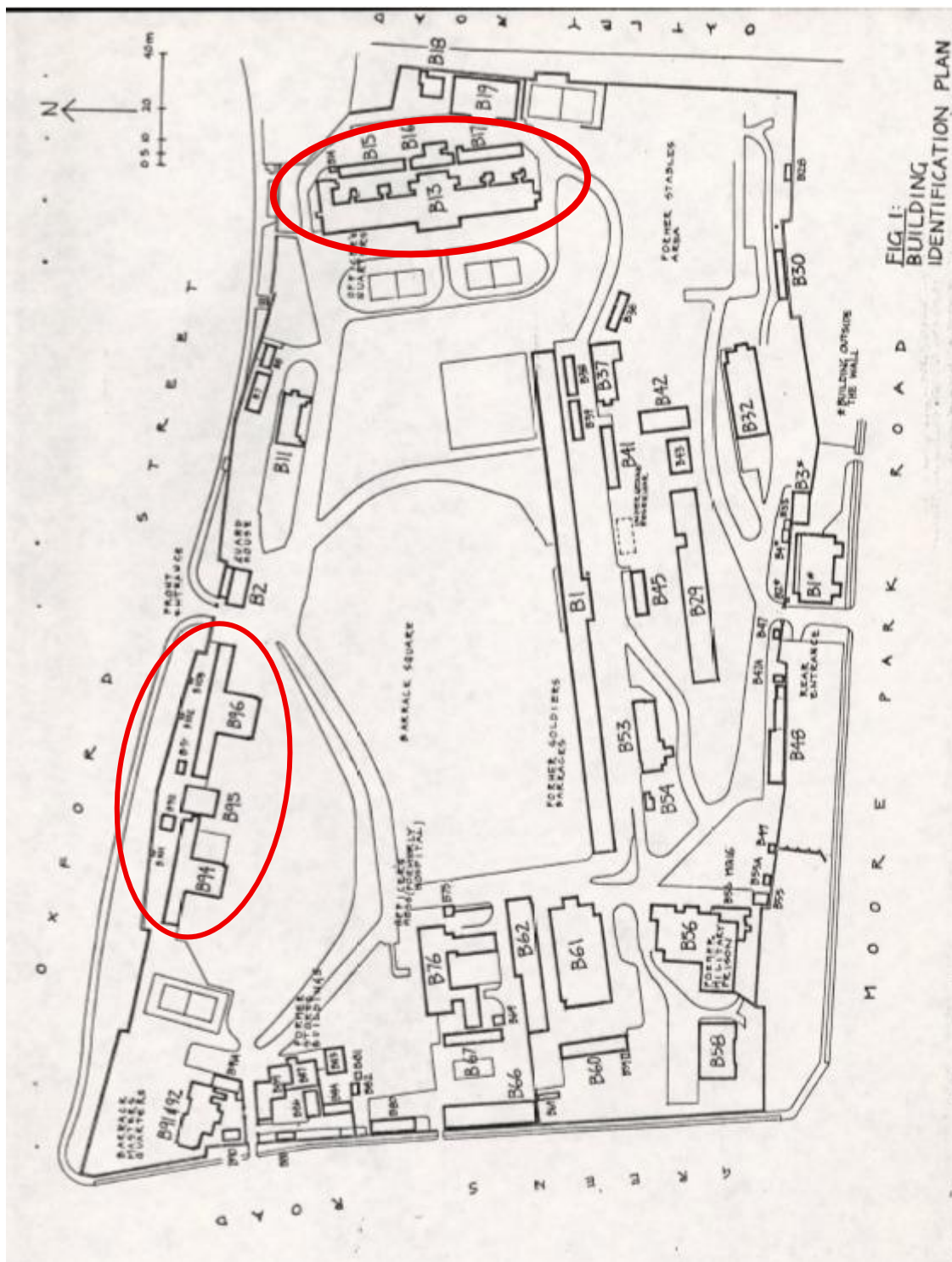


Fig 3
Building groups 94-96 and 13-17
Victoria Barracks - Site and Buildings Plan (CLSP 1984)

Additional Information of the Significance of Buildings 94 - 96

The subject buildings were erected in the Edwardian Development Period (1901-1918), a period of substantial development in relation to the formation of Australian Army Corps, which coincided with Australia's involvement in the Boer War in South Africa and First World War.

LSP 1984 identify this period as the 5th development phase of the Barracks, which being a military establishment are heavily influenced by the national requirements for internal and external security.

Bldg No	Date	Original Name/Function	1984 Name/Function
94	1912	Australian Field Artillery Building	HQ Elec & Mech Engineering
95	c1912	Brigade Office	HQ to Supply Group
96	c1913	Australian Field Artillery Building	District support unit V Barracks

Summary of construction dates and early functions
(CLSP p19)

Each of these three buildings is included in the Description section of the Commonwealth Heritage Listing for the Victoria Barracks Precinct.

This general description of the built environment within Victoria Barracks is drawn from (GBA 2003)

The buildings located on the Victoria Barracks site represent evolving military architectural styles and designs from the nineteenth and twentieth centuries. As noted in the 1983 Plan, a small number of the early buildings have been demolished. Those buildings which have been lost are the two stables and thirteen privies behind officers' quarters, the canteen yard with kitchen and servant's room, and privy, a magazine by the north wall, washing houses, workshops, hospital kitchen and privies, and those privies for soldiers' quarters.

These buildings from many periods continue to be used for military purposes, although not necessarily their original purposes. External features of these surviving Barrack buildings range from a fair level of intactness to those in excellent condition. Examination of the internal structure of the buildings shows little remaining integrity, with few exceptions. Isolated remnants of original internal fabric can still be identified in many buildings, although not enough survives to enable accurate reconstruction or restoration.

There was a small magazine building and protective wall near to the eastern end of Building 96, which would have been demolished prior to its construction.

The subject buildings are located on the "Soudan Parade Ground Precinct, as defined in the GBA 2003 document. (pp24-26).

They are a symmetrical, continuous and substantial composition of single and two storeys, which back onto the primary defensive stone curtain wall that stretches the full length of the Oxford Street boundary.

The Soudan Parade Ground Precinct – Buildings 94-96

Description of the Precinct

This precinct is situated in the north-western corner of Victoria Barracks. This precinct is characterised by the key buildings aligned parallel with Oxford Street, behind the perimeter wall. These buildings are separated from neighbouring structures by a secondary parade ground known as the Soudan Common and the secondary roads of Bushman Way and N.S.W. Infantry Way. Subsidiary features of this precinct include the 'A' Field Battery Memorial RML Gun and the tennis court, formerly the site of the Artificial Limb Factory.

This precinct contains within it buildings, infrastructure, landscape elements and movable items which document the development of the complex from the 1890s to the end of World War One in 1918. Within this area, the first building along N.S.W. Infantry Way is the 1912 Australian Field Artillery, with the Brigade Office adjacent to it. A second Australian Field Artillery building identical to the first was constructed in 1913, but separated from its twin by the Brigade Office. An adjoining engine room was added to the second Artillery building in 1916. The engine room was constructed on the site of the former ASC Drill Hall. Behind these structures, against the perimeter wall and running parallel to Oxford Street are two small buildings originally constructed in 1913 as latrines. These feature a Palladian-style composition and an idealised functional arrangement of offices, stores vehicles and services.

The landscape is distinguished by broad areas of asphalt; the space defined by the buildings to the south and a mature line of Phoenix canariensis to the south. There is restricted planting of trees to the north of the buildings and between the sandstone wall to Oxford Street frontage. The overall landscape within the precinct reflects the themes of The Changing Environment and Defence. The structures and landscape elements reflect the sub themes of Administration, Staff Facilities, Landscape, Movable Heritage, Workshops and Storage, and Transportation.

Analysis of the Soudan Parade Ground Precinct

The siting of this precinct represents the northern limits of the Barracks facility along Oxford Street, developed in the late nineteenth and early twentieth centuries. Its evolution is principally associated with the expansion of the Australian Army Corps, and the administration of forces during the Boer War and World War One.

The environment played a key part in determining the layout of structures in the precinct, due principally to the former existence of two magazines and encasing wall, once located in the grounds near the Victoria Gateway.

The availability of land and the laws governing separation distances between explosives storehouses determined the placement of such buildings and reinforced the shared intimacy between structural and environmental features. In this instance, at the time of the magazine's construction there were few buildings in the vicinity, making it suitable for security reasons.

The earliest buildings documented in this precinct were the magazines and the ASC Drill Hall in 1890, neither of which exist in the present day. A third, small building was constructed in that year. This was located next to the Drill Hall and its purpose is unknown.

This was evidently demolished c.1912 to make way for the extant buildings. These early, now demolished, buildings, formed part of a larger building programme resulting from the formation of new Army units such as the Mounted Infantry (1885) and the Commissariat and Transport Corps (1891) as well as growing sectors of artillery, infantry and Medical Staff Corps. This growth period was halted by the onset of economic depression, but by the turn of the century, previously undeveloped areas of the barracks had specific roles to play in the Barracks' operation. This was generated by heightened military activity with Australia's participation in the Boer War and the preparation of military forces for World War One.

The operational processes of the precinct are demonstrated not only in the relationships between the thematic elements, but also in the construction of the buildings. The explosives magazines of the 1890s had been faced away from key structures, limiting the impact of prospective blasts. Field Artillery buildings, constructed immediately prior to World War One, contained wagon sheds, harness rooms and gun parks on the ground floor and storerooms on the upper floor, representative of the importance of horse transport to the Barracks. The Artillery buildings were typically symmetrically arranged Edwardian brick military buildings that showed the defensive organisation and attitude of early Commonwealth forces.

As in all the workshop and storage areas Staff Facility buildings are present. The ubiquitous toilet blocks, which are dotted all over the site, reflect the great distances which the staff had to move from the main administration area. Staff facilities and small administration offices in workshop areas were necessary to keep work practices efficient.

In 1916 an artificial limb factory was constructed at the end of this precinct, providing a necessary supplementary service during World War One. This site was likely to have been selected for the building on consideration of available space, and the specific need to locate the factory relatively near to the Barracks Hospital. This World War One building exists today in the form of a tennis court that approximates the same dimensions as the factory. Such adaption is typical of the pattern of building use in this precinct, as surviving buildings have been extensively modified internally to suit new uses. The addition and alteration of the buildings over the course of the twentieth century maintained the existing use patterns of Administration, Staff Facilities, Transportation, Workshops and Storage, and Landscape.

Each of the three buildings, although individually erected in 1912-1913 are described as *typically symmetrically arranged Edwardian brick military buildings that showed the defensive organisation and attitude of early Commonwealth forces*. A comparison of the 1943 and 2026 aerial photos suggests that the original slate roofing on these buildings has been replaced with corrugated iron roofing, which is in very good condition.

There are reports that the interiors of most early buildings within Victoria Barracks have been altered and re-used periodically in response to changing functions. Internal and external inspections have not been possible during the preparation of this report.

Heritage Assessment

Buildings 94, 95, 96, were erected in the lead up to the First World War to support Field Artillery formations. The unified row of two storey buildings, face south-east over the former Soudan Parade Ground, towards the main Parade Ground with its fine backdrop of mid 19th century Georgian Revival Sandstone buildings. The distinctive group has historic, historic association, aesthetic, representative and rarity values as part of Victoria Barracks.

South Africa Square Precinct and Parade Ground – Building, 13, 15, 16, 17

The two storey sandstone Building 13 was initially erected in 1841-45 with its northern extension, in c1863, reflecting first and the second phases of development (1850-1870) within the Victoria Barracks precinct by British Military Forces. Buildings 15, 16 and 17, of single storey configuration and located behind Building 13 are currently used as garages.

Like Building 1, Building 13's main façade is also notable for its two storey verandahs, which unlike Building 1, are continuous across the central gabled projection.

Bldg No	Date	Original Name/Function	1984 Name/Function
13		Officers' Quarters	Married Quarters
	c1863	Officers' Quarters Northern Extension	Married Quarters
15	c1845	Kitchens	Garage for Married Quarters
16	c1845	Kitchens	Store ?
17	c1845	Kitchens	Garage for Married Quarters

Summary of construction dates and early functions
(CLSP p15)

The subject buildings are located on the "South Africa Square Precinct, as defined in the GBA 2003 document. (pp24-26).

Description of the precinct

This precinct is prominently situated in the centre of the Victoria Barracks complex. It contains structures, infrastructure and other natural and built elements that comprise the site's key spatial relationship and documents the establishment and evolution of the Victoria Barracks from the early 1840s onwards.

The precinct is set within an area featuring natural landscape elements including the centrally located grass parade ground framed by a high ridge, ornamental and historical plantings, and an outlook onto Oxford Street. Of the built structures, several late Georgian period buildings, which were the first to be constructed for military purposes, can be identified strategically located around the central parade ground. The main buildings are the Soldier's Barracks and Officer's Quarters, both of which are situated on high ground rising up from the lower-lying parade ground.

Directly behind the latter building are several secondary structures that cannot be seen from the Oxford Street vista. These have been situated behind the main buildings to provide supporting military and domestic services. The buildings in this area are all composed of similar materials, with sandstone walls and slate roofs. Similarly, the guard house and Queen Victoria Gateway at the Oxford Street entrance are composed of sandstone, which complements this group of buildings that are visibly interrelated by both material and style, but physically separated from each other by the parade area.

Analysis of the South Africa Square Precinct

This precinct is the heart of the original Barracks development, begun in the early 1840s. The main parade ground, known as South Africa Square, is considered a key icon or symbol of the Barracks and acts as the centre point for its ceremonial and regimental roles.

The layout of this precinct was based on the design of a former barracks complex in George Street, built in 1792 and demolished on the grounds of poor condition and location. The Paddington precinct, once the reserve on South Head Road, was high ground dominated by scrubland, sand and occasional rocky outcrops. The topography was ideal for defence purposes, and the land was cleared during the construction of the first buildings. The Paddington site had additional advantages in its proximity to Busby's Bore, and a sandstone supply provided on-site building material.

The original facility was located well out of the town centre to avoid problems with town planning and street alignment, on higher ground for strategic defence purposes, and close to Busby's Bore for its water supply. The complex was connected to Sydney township by South Head Road, now known as Oxford Street. The South Head Road gateway was the primary point of access, with a secondary access point located to the rear of the complex, along present-day Moore Park Road. South Head Road was the link with the town and Sydney harbour, where gunpowder and supplies from ships, stores and naval facilities were landed and initially stored.

The buildings on the high ridge above the parade ground's perimeter performed mainly staff and administrative functions. They were sited away from dangerous operational areas, close to the road access point and staff facilities, and allowed extensive views over what is now the Paddington area. The original complex built in 1843-46 consisted of Georgian-style soldier's quarters, Victorian Regency officer quarters, toilet blocks, kitchens, and the guardhouse fronting the perimeter entrance gate.

The buildings served several functions, the main Soldier's Barracks comprised an orderly room, schoolroom, regimental store, sergeant's mess, larder rooms and cloakroom. Some of these facilities were modified to accommodate changing requirements as early as the 1880s, when extensive internal alterations were required to convert rooms into offices. The Officer's Quarters, composed of forty officers' barrack rooms, with single officers in the northern wing, and two family residences in the southern wing, was altered by 1870 for the extension of both northern and southern ends of the building. Further change was recorded in 1910 when Wunderlich metal ceilings were placed in many of the building's rooms, and other twentieth century alterations proved so extensive that ultimately the original interior layout is no longer in evidence.

Significant alterations have been made to these buildings in line with their change in function, which has in many instances resulted in interiors that have little or no original fabric, and bear little similarity to the layout of the structure as originally built. As a result of this pattern of usage, the buildings in this precinct are in fair to good condition externally but internal inspection identifies deteriorating building material and mutilation of early building features.

While specific functions of buildings changed over the years to reflect changing attitudes and military needs, the general patterns of siting and support present from first construction, are still extant. The Soldiers' Quarters now operates as Headquarters, Field Force Command, with the Officers' Quarters changing to serve as Married Quarters. The kitchens associated with the Officers' Quarters are still in use as service facilities: garages, a store and a small chapel.

The majority of the trees within this precinct have been planted to commemorate people associated with the Barracks. It is a tradition, for example, that the outgoing Land Commander plants a tree within this precinct.

Heritage Assessment

Buildings 13, 15, 16, and 17, were erected in the first major development phase of Victoria Barracks in the mid 19th century. The two storey Building 13, which was actually erected in two stages, provided Officer's Quarters and complemented the general presentation of the much larger Building 1, which housed Other Ranks. The Officers' Quarters building was set on the higher ground to the east of the main Parade Ground, demonstrating the organisational ranks of its occupants. The two fine Georgian style sandstone main accommodation buildings define the spatial and aesthetic character of Victoria Barracks and can be described as the iconic ceremonial image of the Barracks when viewed from the main entry gate off Oxford Street.

Despite subsequent internal upgrades for married quarters, Building 13 retains its original aesthetic and architectural qualities.

The small, single storey buildings 15, 16 and 17 located at the rear of Building 13 and served as kitchens and subsequently as garages and stores. These buildings are only visible from within their immediate locality.

The distinctive group has historic, historic association, aesthetic, representative and rarity values as part of Victoria Barracks, with particular recognition of the former Officers' Accommodation Building, at National, State and Local Significance as a component of the Victoria Barracks Defence establishment.

Impact Assessment of Shadows and Outlook

A detailed assessment diagrams have been prepared by Smart Design Studio, comprising *Overshadowing - Reserve Trees* along the Oxford Street frontage. and *Overshadowing – Barracks*.

The plan diagrams in the *Reserve Trees* assessment illustrate a series of hourly shadow positions at mid winter's day, 21 June.



Fig 4

Shadow (brown) thrown from the proposed development at 160 Oxford Street, with existing shadows from the trees along Oxford St are illustrated in purple. at 13.00 hours on 21 June

These set of plan diagrams clearly demonstrate that the proposed development will not throw any shadows over the Oxford Street perimeter sandstone wall. Buildings B94-B96 and the small associated outhouses, are already thrown into shadow from the trees in Oxford Street and others in the narrow space between the subject buildings and the sandstone wall.



Fig 5

Aerial view of Buildings 94-96 and the rows of trees in Oxford St and within the Barracks perimeter (Source: Nearmap Oblique photo)

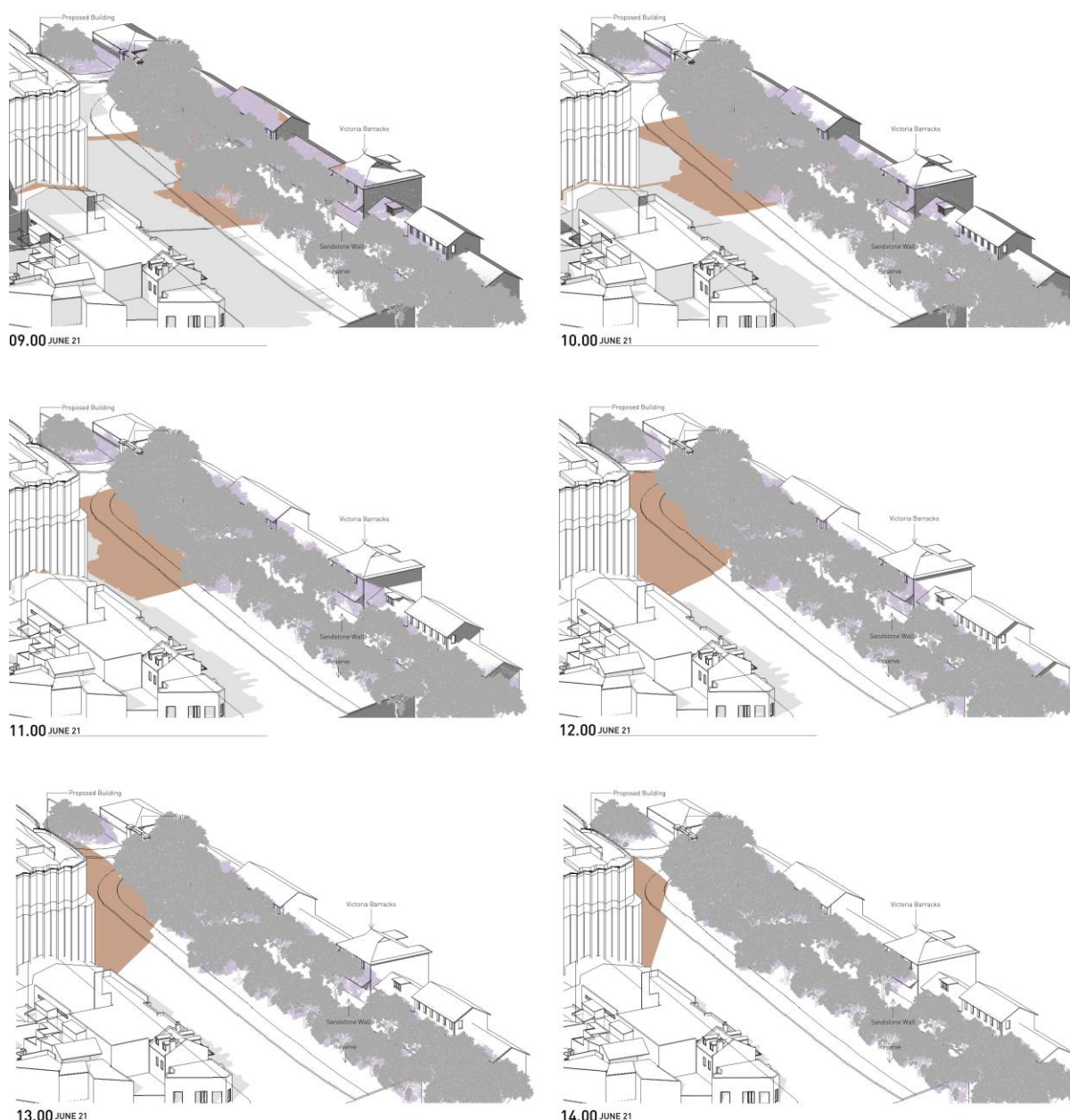


Fig 6

Overshadowing diagrams on 21 June. The shadows from the proposal are shown in brown and those from the trees are shown in purple

Very minor additional overshadowing of buildings 95 and 96 will occur around 9am

The project arborist, Tree Management Strategies, notes that the above overshadowing images show the deciduous trees in and adjacent the Victoria Barracks at their smallest foliage extent. The tree's crowns will have greater foliage in the warmer months.

Buildings 94, 95 and 96 were located and erected within a specific part of Victoria Barracks in accordance with their functional role in the lead up to the First World War, and the availability of satisfactory space within the surrounding defensive walled perimeter. They have no visibility from the public realm in Oxford Street and have no outlook beyond the Barracks precinct.

The buildings turn their backs to the nearby Perimeter Wall, the narrow space between the two features accommodating toilet facilities. The wall itself throws shadows onto the intervening space and onto portions of the subject buildings.

Shadow diagrams have confirmed that there will be almost no shadows thrown onto Building 94-96. It should be noted that the proposed development has been reduced in height since the preparation of these overshadowing diagrams, thereby further reducing any impacts.

The passing presence of some shadowing onto the northern face of the Perimeter Sandstone Wall will not generate any adverse impacts on the heritage significance of these buildings, the wall and Victoria Barracks as a whole.

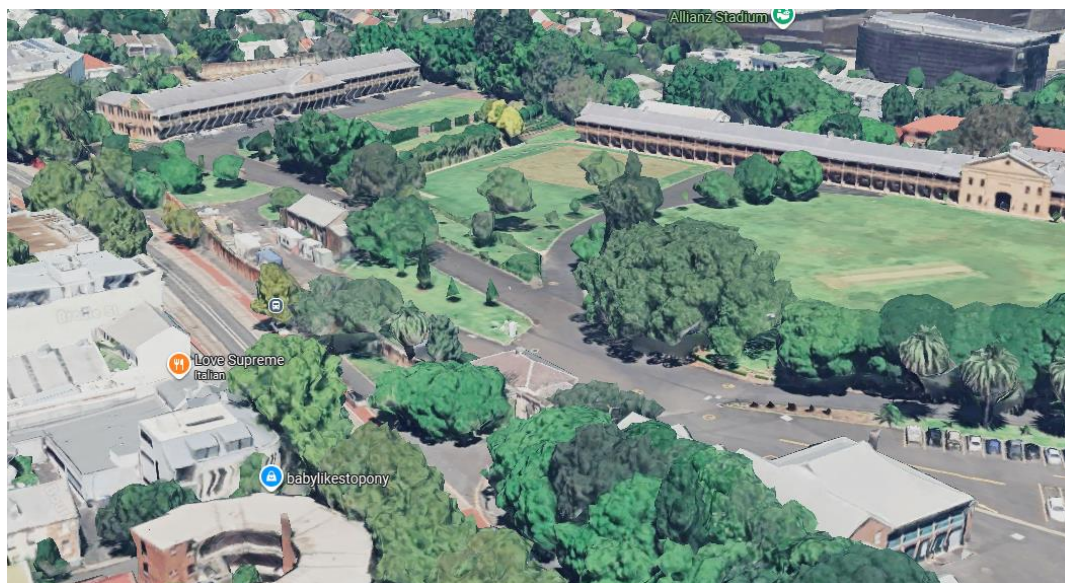


Fig 7

All of the buildings within the above analysis have been present within Victoria Barracks for more than 100 years. Building 13, the long two storey on the left of the photo will not be affected in any way by the shadows cast from the proposal at No. 160 Oxford Street.

The elevated location of the 1840s Officers' Accommodation building (B13), with its row of two storey verandahs across its entire main elevation, was clearly designed to enable outward views for the officers, in addition to the demonstration of its military hierarchy. The occupants of Building 13, in the almost 200 years since it was erected, have been able to view the surrounding built environment, both nearby and further west to central Sydney, grow progressively.

The wide arc of the changing skyline, when viewed from the balconies of Building 13, are an essential evolutionary outcome and component of its cultural significance. The addition of the current proposal as a component of that viewshed, will not generate any adverse impacts on the heritage significance of Building 13 nor on Victoria Barracks.

The above imagery demonstrates that the buildings in the northern part of the Victoria Barracks, most notably buildings 95 and 96, are already partly overshadowed by mature trees on either side of the Victoria Barracks wall. The overshadowing diagrams show that the proposal will result in very minor overshadowing of buildings 95 and 96 for a short period of time in mid-winter.

The proposal will have a very minor impact on the curtilage of the Victoria Barracks and buildings 95 and 96.

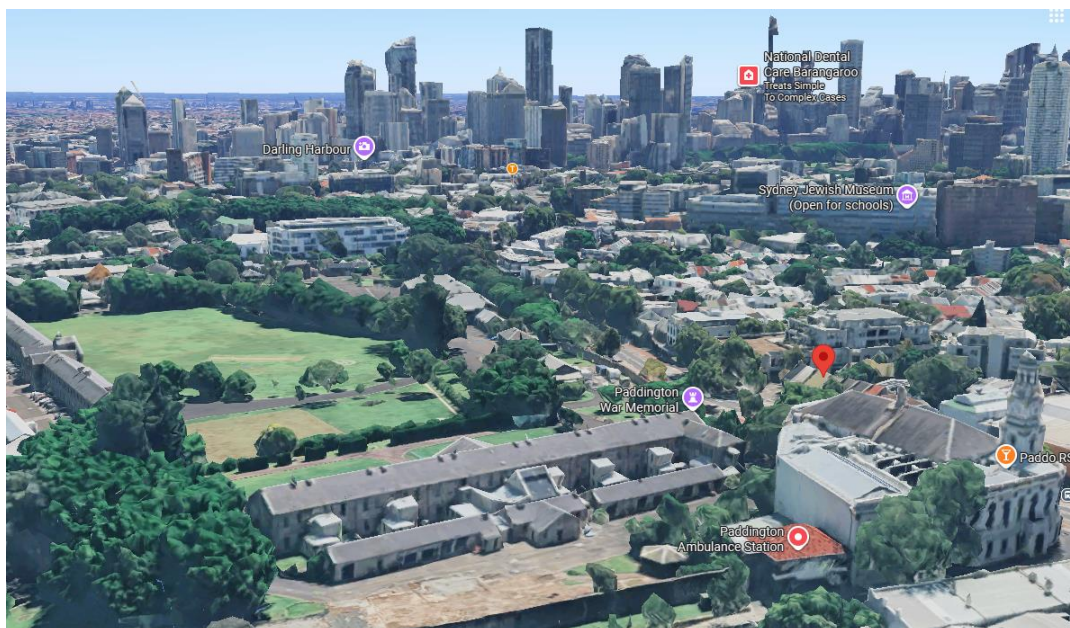


Fig 8

Fig Occupants of B13 have enjoyed expansive and ever-changing views since the 1840s
(Source Google 3D imagery)

Additional Visual Analysis

HNSW originally requested the Visual Impact Analysis to include views from within the Barracks Precinct in particular, from Building 13 with its long two storey verandahs, which is the primary source of outlook into the surrounding and long-distance views.

After lengthy and unsuccessful attempts to gain access into the Barracks Precinct to set up at least one location for a Visual Impact Assessment, discussions were opened with DPHI to see an alternative location could fulfil this requirement.

On 22 April 2026, DPHI advised that they had met with HNSW to close out this issue. HNSW indicated that they would be satisfied if there was an additional VIA viewpoint in the Oxford Street streetscape, from next to the Barracks Wall closest to Building 13.

In accordance with this advice from DPHI, an additional viewpoint (No.8) was analysed and added to the formal Visual Impact Assessment report. The distance from Viewpoint 8 to the proposed building is approximately 180m down the sloping topography. From that location there are trees along the southern street footpaths.

By comparison viewpoint distances from the long upper storey verandah on Building 13 vary from around 220 to 270m. Aerial images of views taken from within the Barracks confirms the presence of a range of trees scattered across such sightlines.

This heritage impact commentary has been prepared from an examination of the additional material. Primarily and when reviewed in association with the above Fig 8, the location selected by HNSW and advised by DPHI will provide sufficient information to undertake this additional Visual Impact Assessment.

The image below is contained in the amended Visual Impact Assessment report. The distance and the sloping topography

12.2 VIEWPOINT POSITION 08 - Oxford Street (Barracks Wall)

VIEWPOINT LOCATION



Fig 9

The agreed location is identified as Location 8, at the bottom right hand corner of the aerial photograph.

12.6 VIEWPOINT POSITION 08 - Oxford Street (Barracks Wall)

PROPOSED DEVELOPMENT WITH FUTURE MASSING

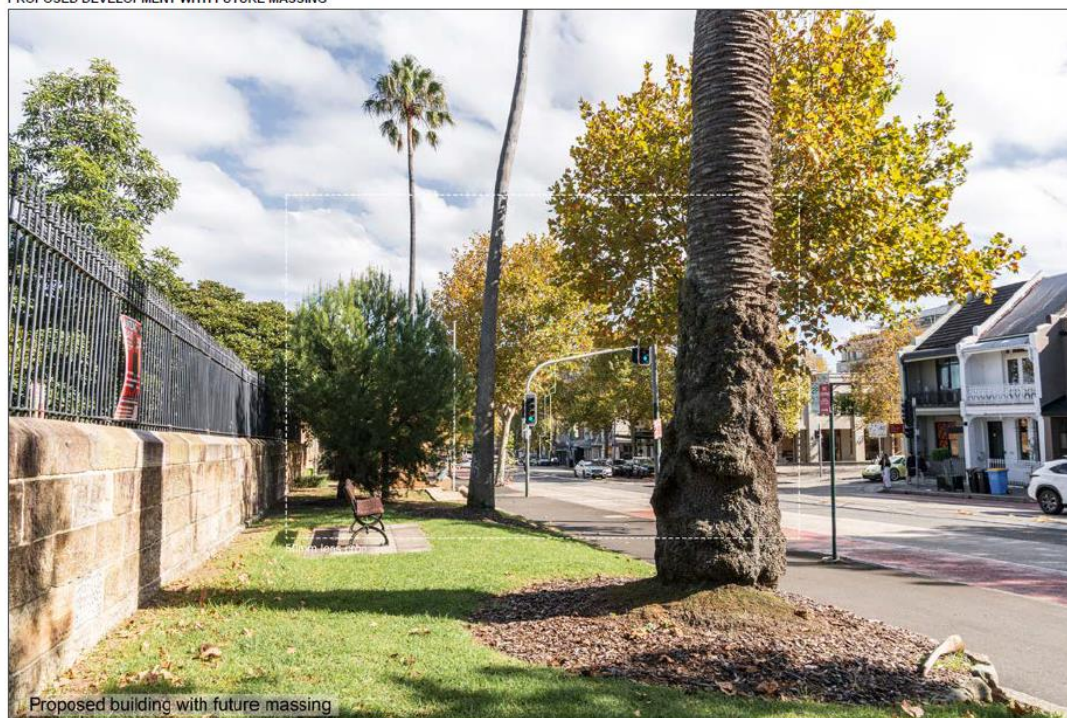


Fig 10

Extract from P53 from the 12 May amendment of the VIA Assessment

It is clear from this image that there are many trees along the southern edges of Oxford Street that completely block the visibility of the proposed development from this locality.

Accordingly, it can be reasonably concluded that views from nearby and within the eastern end of the Barracks precinct will not be adversely affected by the introduction of the subject development, into what is already a lively outlook towards the city and nearby modern buildings.

GBA HERITAGE PTY LTD

A handwritten signature in black ink, appearing to read 'G. Brooks', with a stylized, cursive script.

Graham Brooks

Director

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