

16 March 2026

Victor Casanata
Planner
State Significant Development
NSW Government

By online portal

Dear Mr Casanata,

National Trust submission relating to 160 Oxford Street, Paddington

The National Trust of Australia (NSW) expresses its objection to the proposed development at 160 Oxford Street, Paddington, noting in particular that the building is not of an appropriate scale for the important heritage nature of its surroundings.

Heritage Context

160 Oxford Street is located within both the National Trust's *Paddington Urban Conservation Area* and the Woollahra Council *Paddington Heritage Conservation Area*. The National Trust listing describes Paddington:

*The townscape of Paddington is undoubtedly unique due to the steep topography of the area coupled with the irregular street layout that affords dramatic views to the Harbour and within the terraced streets. The major components are the Victorian terraces which **display a high degree of coherence and continuity while the area has remained relatively free of intrusions.** The buildings and street layout illustrate a pattern of urban development no longer practiced but which can provide the opportunity for a high-quality residential environment. **Paddington makes a major contribution to the heritage of Sydney** and its character and urban form and it was here that local residents first banded together to protect their suburb from being destroyed by unsympathetic development.*

The Woollahra LEP *Paddington Heritage Conservation Area* statement of significance notes:

*Paddington is a unique urban area which possesses historical, aesthetic, technical and social significance at a National and State level. **An important factor in the significance of Paddington is its exceptional unity, encompassing scale, character, history, architecture and urban form.***

The built environment of Paddington is an excellent example of the process of 19th century inner city urbanisation of Sydney which was largely completed by 1890. The predominant Victorian built form is an excellent representative example of the phenomena of land speculation and a 'boom' building period between 1870 and 1895.

The terraces of Paddington clearly trace the evolution of the imported English Georgian and Regency terrace models into the distinct Australian style evident in the Victorian era terraces.



Paddington retains many significant types of buildings that represent all phases of the suburb's historical development. These building types range from modest, small-scale, single storey timber and masonry cottages, to remnant examples of former gentry mansions, boom style middle-class terrace houses, apartment blocks and contemporary infill development, all of which are set in a varied network of streets, lanes and pedestrian accessways which reflect the phases of subdivision and development.

*Paddington has important associations with the evolution of the conservation movement in Australia, in particular with the actions by the National Trust and the Paddington Society, which ensured its conservation at a time of redevelopment threat in the 1960s. **It is significant as the first suburb classified by the National Trust, a community based, non-government organisation committed to promoting and conserving Australia's heritage.** Paddington has a unique aesthetic significance due to the superimposition of the built form on a sloping topography which overlooks Sydney Harbour and its foreshores. The coherent and extensive Victorian built form comprising groups of terrace buildings on narrow allotments which step down hills, turn corners or sit in ranks along tree lined streets produces a singularly recognisable image.*

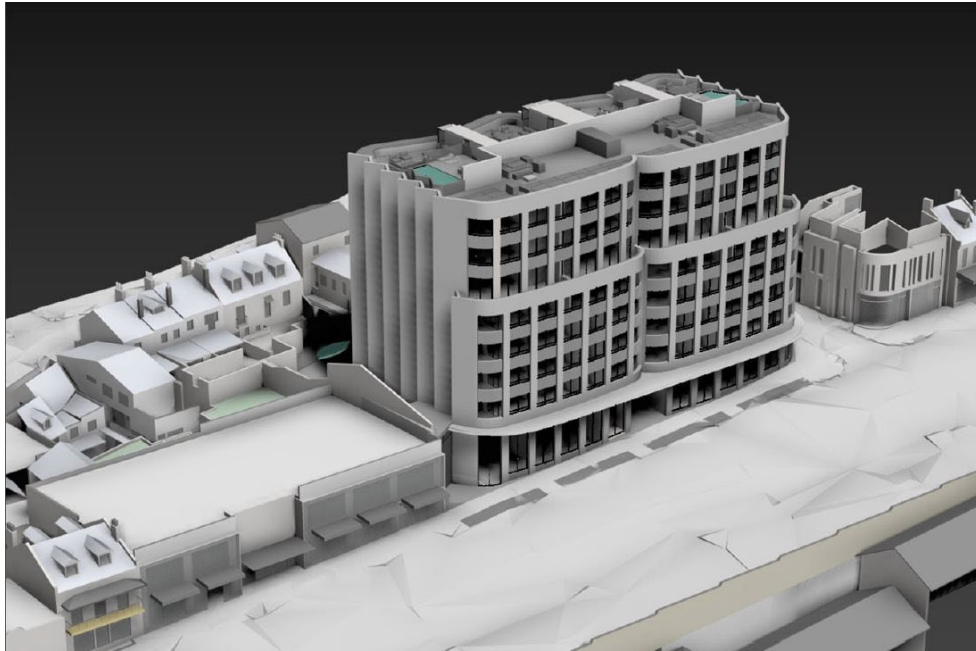
Paddington also includes a number of other historic sites, including Victoria Barracks, Paddington Town Hall, Paddington Post Office, Hotels, Churches and gardens. The suburb of Paddington is valued for its Victorian terraced character designed around the local topography, and the precinct has an important history as part of the grassroots heritage conservation movement in Sydney. It is clear that any changes to the suburb should be sensible and sensitive to their surrounding context.

Size of the building

The proposed development is eight storeys high, sited amongst double storey structures, far exceeding the scale of the local area. We note that the significant increase in height will irreversibly change the character of Oxford Street and poses a threat to nearby properties in terms of privacy, views and solar access.



Elevation of the proposed building in context



Proposed building model



Proposed view from Shadforth Street

Victoria Barracks

The subject site is located directly across the road from the Commonwealth heritage listed Victoria Barracks (also listed on the National Trust register and City of Sydney LEP).

The National Trust report describes the following reasons for listing Victoria Barracks:

- 1) Historically and architecturally this is one of the outstanding examples of military barracks in the Commonwealth.
- 2) It is one of the three oldest military barracks in Australia.
- 3) The largest group of buildings still in use in Australia erected by convict labour.
- 4) The consistent use of sandstone for building and walls with related landscaped areas makes this one of the most appealing environmental precincts remaining from early Victorian times



The Trust notes that the suburb of Paddington was largely developed during the last quarter of the nineteenth century which grew from the village of workers building Victoria Barracks from 1841-47. It is important that the relationship between the Barracks and its surrounding suburb remain tangible. However, the proposed development seeks to insert an eight-storey building directly in alignment with the central axis of Victoria Barracks and Paddington. The National Trust cannot accept this as a suitable outcome.

We note that the Visual Impact Assessment does not include views from inside Victoria Barracks, despite the site being both the most significant nearby heritage item and in such close proximity to the development. This is a major oversight.

The National Trust notes the Statement of Heritage Impact by GBA Heritage makes the following assessments:

- “the proposal will have an acceptable impact on views and the setting of the Victoria Barracks.”
- “No views to the subject listed parts of the Victoria Barracks will be negatively impacted by the proposed development.”
- “The proposal will not have a significant impact on the Commonwealth heritage values of Building VB2 Guard House, Victoria Barracks Perimeter Wall and Gates, and the Victoria Barracks Precinct.”

We question how these judgments can have been made when no assessment of visual impact has actually been undertaken from the site, despite page 15 of the SoHI stating “The assessment under criterion notes that the visual link between the Barracks and Paddington has significance.”

A quick investigation shows that the site of the development aligns completely with the axial view from the main barrack building, and the Trust questions how this cannot be considered worthy of investigation. We also note that the former Soldiers Barracks and Parade Ground (VB1) & Officers Quarters (VB13, VB15, VB16, VB17) are not mentioned or analysed in the assessment.



Line showing connection point between Barracks building and development site



It is the opinion of the National Trust that the visual and heritage impact on an incredibly historic, Commonwealth Heritage listed site, in which whole surrounding neighbourhood has been designed around and in response to, should be appropriately investigated and assessed as part of this process. The suburb of Paddington cannot be separated from Victoria Barracks should we wish the heritage of this precinct to be properly understood, conserved and celebrated.

The Trust also note that the Statement of Heritage Impact (p.16) makes the following statements:

“The proposal provides an aesthetically balanced and visually broken-up presentation to Oxford Street. The sandstone walls will soften the building, while the curved design and ribbed spandrels and balconies will provide high-quality design features.

The subject building represents design excellence and will contribute to the architectural qualities of the Oxford Street streetscape and the Paddington urban landscape.”

Given that the bulk and scale of the building is so great, the Trust cannot agree that any form of design excellence or material choice can lessen the heritage impact of this building in this location.

Affordable Housing

The National Trust notes that the proposal will include 10 affordable dwelling units (of a total 40 units developed). We further note that these 10 affordable dwellings will only remain under the scheme for 15 years before they can be released for private sale at market price.

It is our understanding that the proposal seeks to demolish 30+ dwellings as part of the redevelopment, including a three-storey apartment building containing 27 studio flats. The National Trust notes that older apartment blocks generally provide cheaper housing, as they are smaller, less modern and contain fewer amenities. In a suburb such as Paddington, this diversity of housing stock is uncommon, and viewed by many to be essential to be retained for a variety of people to be able to reside in the area.

In 2024 the National Trust supported the City of Sydney Planning Proposal for Dwelling Retention. This proposal identified a growing trend in redeveloping residential flat buildings containing smaller apartments into developments containing significantly fewer, larger apartments, leading to a reduction in the diversity of housing in parts of the local government area.

We understand that this is exactly the scenario that the City of Sydney is trying to avoid, with the proposal seeking to replace 27 smaller, more affordable apartments with only 10 new ones, alongside 30 luxury dwellings, four of which contain private rooftop pools and views across the city. The National Trust would argue that the development can in no way be labelled ‘affordable’.

Conclusion

The National Trust urges the consideration of whether this development truly provides the affordable housing that it promotes, noting the demolition of studio flats that it would entail.

The Trust would argue that this project, located within the Paddington Heritage Conservation Area and directly on the main axis of Victoria Barracks, will have a negative heritage impact on the immediate heritage context.

We would urge a design of smaller bulk that is more considerate of its important location.