

**RE: MIXED USE DEVELOPMENT WITH AFFORDABLE HOUSING 160 OXFORD PADDINGTON
(SSD97528708)****INTRODUCTION**

This submission is an objection to the proposed mixed use development with affordable housing at No. 160 Oxford Street Paddington. This submission supports and endorses the submission by Paddington United objecting to the proposal.

I refer to the applicants architectural drawing by Smart Design.

The objection is based on:

- Inappropriate height, bulk and scale
- A significant adverse impact on the Paddington Heritage Conservation Area and Heritage items in the vicinity
- The proposal does not achieve the heritage conservation aims and objectives in the Woollahra LEP 2014 (LEP)
- The proposal does not achieve relevant objectives and controls in the Woollahra DCP 2015 - Chapter 1 - Paddington (WDCP) which support the heritage provisions in the DCP
- The proposal is contrary to the desired future character of Oxford Street and Paddington
- The proposed development will create an undesirable precedent in the Paddington HCA and significantly erode the heritage character of the Conservation Area
- The proposal is not in the public interest
- The reviewed applicant material reviewed in this cannot be relied upon to make the required considerations of the consent authority under the S4.15 EPA Act

AUTHORSHIP AND EXPERTISE

This submission was prepared by Ruth Daniell who holds the degrees B. Science Arch, B. Arch (hons), and a Bachelor of Laws. Ruth was a participant in the "Conservation of Architecture Course" University of York and the ICROM "Marc 99 - Conservation of Modern Architecture Program" in Helsinki.

Ruth has over 30 years experience in Heritage Conservation, specialising in the built environment. Ruth has worked in local and state government positions. At Woollahra Council, she was the heritage officer and wrote the private domain section of the original Paddington DCP, which received an award from RAPI (now the Planning Institute of Australia). At the NSW Heritage Office, Ruth was a manager in the Local Government Team dealing with development applications to State Heritage Items. In private practice, since 2000, Ruth has prepared Conservation Management Plans, Heritage Impact Statements, urban renewal projects, demolition reports and archival photographic recordings. Ruth has been an expert witness in the NSW Land and Environment Court.

The author has extensive knowledge of the locality of the proposed development.

HERITAGE ISSUES WITH THE APPLICATION

APPLICANTS MATERIAL

That consultant reports for the applicant do not provide a sound basis for assessing heritage impacts on the Paddington Heritage Conservation Area and the Heritage items in the vicinity, and the matters for the consent authority is required to consider in the EPA Act.

The reports examined¹ are:

- (i) The Heritage Impact Statement by Graham Brookes and Associates (K)
- (ii) Preliminary Construction Management Plan by Varga Traffic Planning (S)
- (iii) Historical Archeological Assessment December 2025 by Extent Heritage (M)

(i) The Heritage Impact Statement (K) supporting the Proposal

The Heritage Impact Statement by Graham Brookes and Associates (the HIS') prepared for the applicant, selectively overlooks heritage impacts and omits responses to the DCPs Heritage Assessment Criteria that do not support the proposal. The report also makes unsubstantiated claims.

Two sections of the Woollahra LEP 2014 LEP address the conservation of environmental heritage:

Section 1.2 Aims of Plan (f) to conserve and enhance built and natural environmental heritage and particularly in Section

5.10 which has in Objectives (l) a) to conserve the environmental heritage of Woollahra,

(b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views; and

Section 5.10 (4) Effect of proposed development on heritage significance The consent authority must, before granting consent under this clause in respect of a heritage item or heritage conservation area, consider the effect of the proposed development on the heritage significance of the item or area concerned.

The articles in the Australia ICOMOS Burra Charter are the conservation principles that underline heritage conservation and will be discussed in a later part of this report.

The HIS has statements about visibility ie. If it is not visible it is OK and sits atisfies the heritage objectives of the LEP

Section 4.5 P.26 Paragraph 5 states:

The proposal will have an acceptable impact on views and to(sic) the HCA, and upon its setting. Due to the built in character of Paddington, the development will have limited visibility from the suburb to the north of Oxford Street.

In response a building with a height of eight storeys (check height in metres) with a width over 39 metres (check width) will have high visibility in views within the historically early Paddington Village.

Another example is Page 26 - 4.5 'Heritage Objectives of the Woollahra LEP 2014', where statements include:

¹ Due to the 2 weeks time frame for submissions it not possible to review all 26 reports.

The trees in the Oxford Street footpath rise to around five stories in height and will largely obscure views of the proposed building from that street.

In response, this is another statement arguing if it is not visible it is OK and compliant. Development assessments and Land and Environment judgements, have not supported the use of vegetation to hide bulk and scale of a proposed development. The applicant's heritage practice appears to be unaware that Plane trees are deciduous.

The HIS states the opinion that "The proposed building will appear as a background element in views of contributory buildings along Gipps Street and Glenmore Road." It does not accord with the view studies by Colliers reproduced in the HIS, which will be discussed the following sections of this submission. The proposed development introduces an intrusive element which dominates the Heritage Conservation Area as shown following photo montages and in Annexure A.



View from Glenmore Road near Gipps Street on the road in front of the heritage listed Rose and Crown (Village Inn) showing the existing view to two storey buildings. The surrounding historic development forms the setting of the Rose and Crown (Village Inn).

Figure 4.9

Photograph looking south-east from the intersection of Glenmore Road, Gipps Street and Hopewell Lane, in front of the Rose and Crown Hotel. The location of the subject site is indicated with a red arrow

Source: Colliers



Photomontage from the HIS showing the visibility of the proposed development near the Rose and Crown. It shows that the proposed development introduces an intrusive element that affects the character of the area near the Village Inn. The western end of Gipps Street and Glenmore Road. It is intrusive because of its height and scale.

Figure 4.10

The photograph above with the proposed development shown

Source: Colliers

I note that there are many locations in Glenmore Road and the Paddington Heritage Conservation Area where the proposed development will be visible. This not limited to the locations included in the visual impact photographs by Colliers.²

The HIS p. 22 states “No significant views to the Rose and Crown Hotel (Heritage Item No. 525) will be obstructed or adversely altered. that Rose and Crown Hotel, including interiors”. No consideration is given to views from the heritage item which is part of the setting. The Australia ICOMOS Burra Charter has a broad definition of setting. Setting includes more than views.

In terms of assessing the impacts on the heritage item, the Rose and Crown (Village Inn) the questions from the “Guidelines for Preparing Heritage Impact Statements” require a response
Works adjacent to a heritage item or within the heritage conservation area (listed on an LEP)

- Will the proposed works affect the heritage significance of the adjacent heritage item or the heritage conservation area?
- Will the proposed works affect views to, and from, the heritage item? If yes, how will the impact be mitigated?
- Will the proposed works impact on the integrity or the streetscape of the heritage conservation area?

The second question posed in the guidelines for the preparation of a Heritage Impact Statement³ is concerned about views **to and from** the heritage item and the conservation area. The HIS does not address this as this would affect the support of the proposal. The views from the Rose and Crown are adversely impacted by the proposed development, which because of its large scale. This is obvious from the photomontages.

It is my professional opinion that the views from the heritage item forming the setting are adversely altered.

Similarly the HIS does not address views from the Commonwealth listed Victoria Barracks Precinct and the individually listed heritage items in the precinct.

There will be views from the long historic and significant colonial buildings on the southern side of the parade ground and sport oval to the proposed envelopment as well as the views from the open spaces. The proposed development will be intrusive in these views. The proposal introduces a large building that affects the non physical historical connection between Victoria Barracks and the Paddington Village.

² Refer to Annexure A for the Collier photomontages.

³ *Guidelines for the Preparation of a Heritage Impact Statements*, NSW Department of Environment and Heritage 2023.



Views from Victoria Barracks over the sandstone perimeter wall are afforded by the arrows. Source: Author of this submission.

Statements of Significance for the Heritage Items

Statements of Significance are provided from the heritage listing Sheet in the applicants HIS.

It would be unusual for a summary of a Statement of significance to identify views from heritage item. Heritage items have setting which include views and vistas to and from a heritage item (Australia ICOMOS BURRA Charter; NSW Heritage Office, Heritage Curtilages) which need to be considered in assessing development in the vicinity of heritage sites. Article 1.2 of the Again this not included in the HIS.

The HIS does not do not identify any views from within the Victoria Barracks as significant. Again views do not have

The use of Richard Lambs tables, without a view study specific to the Heritage Items and the conservation area is unusual. The conclusions are not reached by the methodology of a view study or any reasoning. The tables are of dubious merit and are not useful for a proper assessment. Refer to a later discussion on Views and Vistas in this submission.



Figure 4.7
Photograph looking south-west from Shadforth Street, near the intersection with Gipps Street
Source: Colliers



Figure 4.8
The photograph above with the proposed development shown
Source: Colliers

Adjacent: Photomontages from the HIS do not support the statements and the conclusion that the proposed development is consistent with the relevant heritage objectives of the Woollahra LEP 2014.

5.10 Heritage conservation

(1) Objectives

The objectives of this clause are as follows:

- (a) to conserve the environmental heritage of Woollahra,
- (b) to conserve the heritage significance of heritage items and heritage conservation areas, including associated fabric, settings and views...

The Heritage Assessment

The Heritage Assessment 4.0 in the applicants HIS is brief and limited in analysis.

In the HIS Section 4.1.1 Settings and Views states "The proposal will not physically impact any listed

heritage item or any contributory item in the Paddington HCA. The potential impacts are, therefore, only on the visual settings and views associated with the HCA and of the nearby heritage items and adjacent HC.

The Burra Charter defines setting in Article 1.12 “*Setting means the immediate and extended environment of a place that is part of or contributes to its cultural significance and distinctive character.*” And the explanation elaborates: “*Setting may include: structures, spaces, land, water and sky; the visual setting including views to and from the place, and along a cultural route; and other sensory aspects of the setting such as smells and sounds. Setting may also include historical and contemporary relationships, such as use and activities, social and spiritual practices, and relationships with other places, both tangible and intangible.*”

Under the heading “Woollahra DCP 2015” the HIS states; “The proposed development is generally consistent with the guidelines of the *Woollahra DCP 2015* that relate to the development in conservation areas and adjacent of heritage items”

The applicant’s HIS does not analyse the provisions of the WDCP-Chapter C1 Paddington HCA. The proposal is not comply with the WDCP objectives and controls including :

C1.3.13 Infill development

C1.4.7 Excavation

C1.4.11 Land Subdivision and site Amalgamation

C1.4.9 Views

C1.4.10 Acoustic and visual privacy

C1.2.4 Desired future character

WDCP C1.3.13 Infill development (new development)

The applicants HIS does not address this section of the DCP.

This section of the DCP encourages contemporary design that “achieve(s) a cohesive relationship between new and existing urban fabric, and which retains and enhances the cultural significance of the heritage conservation area. (Objective 2). Infill development must respect the scale and setting of adjacent contributory buildings’ (Objective 3).

Eight stories plus rooftop does not repeat the scale of adjacent contributory single storey cottages and two storey terraces as shown in the architects eastern elevation reproduced below.

The DCP addresses scale in C4.

Scale - C4 Infill development must not overwhelm its context and should be consistent with the predominant scale of significant contributory development adjoining the site or within the group/row. The scale of infill development must respect and take cues from the lowest adjoining contributory 19th or 20th century development in terms of:

- a) maximum height pattern (measured to the uppermost ridge of the principal buildings [or the base of the parapet where existing], not including chimneys); and*
- b) massing (building volume and size).*

The proposed development does not satisfy the guidelines in the DCP for height and massing (building volume and size), as it is excessive in height, building volume and size. The building dominates the Conservation Area and is intrusive due to the scale. The proposal does not achieve the heritage provisions in the LEP to conserve environmental heritage



The eastern elevation of the proposed development. The green shading is the wall plane of the adjacent contributory buildings. The blue line is the characteristic ridge line. The red line is an eye height projection to the northern edge of the rear building roof of the building.

The HIS largely ignores the Heritage Conservation north of the proposed development.

WDCP C1.3.13 | Objective O4 "is to protect the amenity of adjoining or adjacent residential uses"



The northern elevation of the proposed development facing many properties the Paddington Village including the private open space and living areas of house on the southern side of Gipps Street. Other submissions outline the far reaching amenity impacts on properties in the Paddington HCA.

The applicants HIS is silent on the effects on amenity of contributory buildings and their occupants in the Conservation Area. The northern elevation of the proposed development, shown below will appear approximately 9 metres from the dwellings of residents behind on the southern side of Gipps Street. The dominated facade incorporates windows and balconies that create adverse impacts including:

- Overlooking of private open space and living areas
- Acoustic issues from the noise on balconies(29) and roof top pools (4)
- Light spill at night
- Loss of sky views
- Visual built dominance affecting the amenity of properties
- Wind turbulence created by the high rise

WDCP C1.4.7 Excavation

Excavation is not addressed in the applicants HIS. This is a significant omission in the environmental assessment of impacts on surrounding heritage fabric.

The heritage excavation controls were introduced to 'protect the original fabric of the buildings' significant to the area, both during and after excavation' and to limit the amount excavation, and the amount of excavation contemplated by the controls was a basement level in a residential property. The proposed development is 4 underground levels to site boundaries and would not be acceptable in terms of conserving heritage.

- *The effects of extensive excavation is very likely to have an adverse affect on the original building fabric of historic and contributory buildings in the Paddington HCA located in Shadforth and Gipps Street.*
- *It is well known locally known that there is a significant ground water flow to the properties along Oxford Street including 142-148 Oxford and properties in Gipps Street have pumps to evacuate large amounts of water*
- *The large concrete basement of the scale proposed will divert the natural watercourse and adversely impact on the surrounding properties*
- *The diversion of the existing watercourse likely to cause structural instability damage to historic structures and rising damp*

Excavation objectives O1-O10, (excluding 09) are not achieved. *Note that 03 states: "To ensure that objectives O1 and O2 are achieved by limiting the circumstances where excavation may occur".*

WDCP C1.4.11 Land Subdivision and Site Amalgamation

The site amalgamation results in a large footprint and a building mass that is a typical of the Paddington Heritage Conservation Area. It does not retain existing subdivision and building pattern (O1), and is not appropriate response to the relevant historic character of Paddington and the relevant aspects of its historical pattern of development (O3). The proposal is contrary to the C1 And C2.

WDCP C1.4.9 Views

The applicants HIS has not addressed this section of the DCP.

Views without visual intrusions are important for retaining the heritage significance of the Paddington Heritage Conservation Area and the The Australia ICOMOS Burra Charter in article 8 - Setting states "Conservation requires the

retention of an appropriate setting.⁴This includes retention of the visual and sensory setting, as well as the retention of spiritual and other cultural relationships that contribute to the cultural significance of the place. New construction, demolition, intrusions or other changes which would adversely affect the setting or relationships are not appropriate."

The guideline applicable to the proposal C2 "New development in the public and private domain should be designed and located to minimise the impact on existing vistas or improve existing vistas where possible."The photo montages showing the proposed development in the historic context do not show improved views and vistas but rather intrusive degrading existing views and vistas.

The WDCP CI - CI.6.2 identifies views in the public domain within the Conservation Area. There are many views identified in the Paddington Village View and Vistas map at Annexure B. Importantly the annotation on the map states "View and vistas are not limited to those shown".

Another important view to heritage item is the view from the intersection of Oxford Street at Greens Road looking to the heritage listed Paddington Town Hall at the top of the hill. The 8 Storey height plus roof structures the proposal creates a building that competes for dominance with the landmark Paddington Town Hall.



View showing the Oxford Street streetscape leading to the Town Hall. The red star showing the subject site, which will be more prominent in views to the Town Hall (yellow star) particularly when the trees are deciduous. Note the curvature of Oxford Street. Due to the 8 Storey height plus roof structures the proposed development will detract from the landmark character and heritage significance in this significant view.

⁴ The Burra Charter defines setting in Article 1.12 "Setting means the immediate and extended environment of a place that is part of or contributes to its cultural significance and distinctive character." And the explanation elaborates: "Setting may include: structures, spaces, land, water and sky; the visual setting including views to and from the place, and along a cultural route; and other sensory aspects of the setting such as smells and sounds. Setting may also include historical and contemporary relationships, such as use and activities, social and spiritual practices, and relationships with other places, both tangible and intangible."

WDCP C1.2.4 Desired Future Character

The applicants HIS has not addressed this section of the DCP. The desired future character includes environmental quality and public interest. Public interest forms part of the development assessment. This section of the DCP states:

Applications will be assessed, among other matters, against their ability to satisfy those outcomes relevant to the development proposal.

a) retains the unique national heritage significance of Paddington and recognises it as a rare and distinctive urban area;

Response: The development proposal creates a significant adverse impact due to height bulk and scale.

b) reinforces the area as a special residential precinct; - character and scale are important

Response: The development proposal is not an appropriate character or scale.

c) retains and promotes evidence of the historical development of the area and enables interpretation of that historical development;

Response: The development proposal does not contribute to the understanding of the historical development.

d) retains the cohesive character evident in the low scale, high density built form;

Response: The proposed development detracts from the cohesive character evident in the low scale, high density built form. The density of Paddington in 2024 from the census is 10,412 with a population density of 9,013 per square km. This is high density for an area where the population resides in individual dwellings which are mainly small two storey terrace houses.

f) continues to cater for varied uses and building types within the residential area;

Response: The proposal demolishes a building of 28 studio apartments. These occupants are part of the fabric of the community and will not be able to afford the proposed affordable housing.

g) retains the diversity of building types including multi-storey and single-storey terrace house rows, modest scale timber and masonry cottages, semi-detached dwellings, dwelling houses, commercial buildings, pubs, former industrial buildings, places of public worship, Inter-War flat buildings and public buildings;

Response: The proposed development is an anomaly and not responsive to its context. It is a ubiquitous design and could be placed in dense urban contexts.

h) enables people to walk or cycle to shops, public transport, schools, parks and entertainment facilities in a safe, pleasant and healthy environment;

Response: The proposal introduces over 83 cars to an area that is stretched to the limit by high density historic development. Refer to Annexure which outlines the density of the Paddington from the National census. There is insufficient parking and traffic issues arising from the number of cars and the narrowness of the streets.

The Traffic Report by No assessment of the bike lane impacts one lane each way for cars which will create traffic jams, inability to enter Oxford Street from side streets such as Glenmore and Shadforth Street. An additional 83 cars will have a significant impact on the liveability of the Paddington HCA.

Preliminary Construction Management Plan by Varga Traffic Planning Traffic report does not acknowledge the traffic issues with narrow streets, parts of Glenmore Road and omit the following information:

The Traffic Report has:

- No assessment of the imminent Bike Lane, Project which reduces the current two lane each direction to one lane each way/ lane each way for cars which will create traffic jams, inability to enter Oxford Street from side streets such as Glenmore and Shadforth Street. This is evident in completed sections of Oxford Street west Taylors Square.
- An additional 83 cars will have a significant impact on the liveability of the Paddington HCA.
- Traffic restriction on trucks(signage in place) over 3 ton in the Conservation Area along Glenmore Road between Oxford and Cascade
- Shadforth and Gipps Streets are not suitable for large vehicles and have signage to this effect
- The construction report states that the pavement width of Shadforth Street is 6 metres. However it omits that the width minus a parked car is 4.1 metres. Statistically the operating clearance for an 8.8 metre truck is 3.5-4 metres traffic.
- The narrow section of Glenmore Road where a truck and car travelling in opposite directions cannot pass each other. A car leaving a parking spot halts traffic in both directions. Thirty 8.8 metre trucks a day will impede emergency vehicles travelling to St Vincents hospital. Ambulances use the route to St Vincents Hospital and will be impeded by the proposed vehicle construction route.
- Tradesmen and their tools will not be catching a bus and the constrained parking in the area will be tested to the limit

Response: Glenmore road and Shadforth Street should not be used for vehicle movements.

j) provides for sharing of views and vistas

Response: Refer to views and vistas discussed in this submission.

k) exhibits contemporary design excellence.

Response: Contemporary design that provides an appropriate response to the historic context at scale of four stories would be suitable for a development on this site.

Archaeology

Historical Archeological Assessment December 2025 States that the site assessment was made only in public areas.

No mention is made of the sandstone basement that predates the construction of the town houses. Refer to Annexure.

BULK AND SCALE

“New design should respond to its historic context through an understanding and informed analysis of its character and quality. This will include elements such as its grain, existing patterns of development, important views, scale, materials and building methods. As a consequence, the resulting design should create new relationships between the building, its neighbours and its setting.” - Design in Context: Guidelines for Infill Development in the Historic Environment - NSW Heritage Office & Royal Australian Institute of Architects NSW Chapter 2005

“An important factor in the success of new work is the quality and sensitivity of the design response. New work should respect the context, strength, scale and character of the original, and should not overpower it. Burra Charter Article 22 – New Work, Australia ICOMOS 2013

The proposed development has inappropriate bulk and scale. Site amalgamation obliterates the historic subdivision pattern. The building ignores existing development in the Paddington Heritage Conservation Area.

The small scale Paddington Village dates from the 1840 arising from the construction of Victoria Barracks and has rare and unique heritage significance. It is not the place for a large 8 storey building.

The Oxford Street Heritage Streetscape has high heritage significance as a streetscape. This is without contention. Guidelines⁵ and has significant adverse impacts on the environment including the natural and built environments and social and economic impacts on the locality.⁶

5 NSW Heritage Office and Royal Australian Institute of Architects, “Design in Context - Guidelines for Infill Development in the Historic Context” June 2005, Forward by Hon. Diane, Minister for Western Sydney, Assistant Minister for Infrastructure and Planning and Natural Resources (administration): “The NSW Government is committed to the enhancement of our environment through the promotion of high quality design of new buildings. Recent government initiatives have sought to promote good design that is appropriate for its setting and environmentally sustainable.

Our understanding of what constitutes an appropriate solution to the design of new buildings to fill gaps in an existing historic context has become more sophisticated over the last 15 years. This coincides with growing awareness of the value of our heritage to the community and our built environment.”

6 Division 4.3 S4.15 EPA Act outlines the mandatory matters for consideration including:

- (a) Environmental Planning Instruments (EPIs): Any local environmental plan (LEP) or state environmental planning policy (SEPP) that applies to the land.
- (b) Impacts of Development: The likely impacts of the development, including environmental impacts on both the natural and built environments, and social/economic impacts in the locality.
- (c) Suitability of the Site: Whether the site is suitable for the proposed development.
- (d) Submissions: Any submissions made during the public notification/exhibition period.
- (e) Public Interest: The wider public interest.

The major objection scale of the proposed development i.e. the size in relationship to surrounding buildings or landscape. The scale and the impacts are inconsistent with the principles of the Australia ICOMOS Burra Charter. The proposal is **not consistent** with the design criteria in the "Design in Context -Guidelines for Infill Development in the Historic Context

This document sets out criteria for design fit in historic environments:

01: Character

02: Scale

03: Form

04: Siting

05: Materials and Colour

06: Detailing

The proposed development is not in accordance with the requirements for fit in an historic context.

CONCLUSION

The proposed development is:

- Inconsistent with Paddington Conservation Area
- The historic Gipps and Shadforth Street buildings are small cottages, one to two storey in height, characterised by an average width of 3-4 metres
- Inconsistent with character of the northern side of the Oxford which has:
 - 2 to 3 storey scale of Victorian, Federation, Interwar and later infill buildings (photographs and captions
 - The proposed development the scale and form of the buildings does not respond to the existing • the scale and form of the buildings; and street and subdivision patterns being 8 storey at the front and 9 at the rear; and due to the large scale site amalgamation of street and subdivision patterns, large massing, materials, materials, and building techniques and details
- The proposed development has a significant adverse impact on views and vistas and skylines
- The proposed development will impact on the appreciation of Paddington as a unique heritage place by Sydney residents and international tourists
- The proposed development is too large, too tall and out of character with the area, as shown in the following photograph.



The photograph of the model supplied by Toohey Miller showing the scale of the building. It is out of scale and character with the modelled buildings in the Conservation Area

In conclusion the grounds for the objections outlined in this report have outlined that the proposal is significantly non compliant with the Woollahra LEP heritage provisions to conserve the heritage of the Paddington Heritage Conservation Area, relevant provisions in the WDCP- Chapter I, which supports the WLDP. The proposal will have a significant impact environmentally and is not in the public interest.

RECOMMENDATIONS

The following recommendations are made:

- That the proposed development be reduced in scale minimising excavation, construction and construction vehicle movement, the amenity impacts on contributory properties to the north of the proposed development and the intrusive impacts on the Paddington Heritage Conservation Area.
- The proposed development should be limited to four stories
- The proposed development should employ contemporary design that is appropriate to the historic context, ie. scale grain, height, bulk and scale
- That the proposed development contain 28 studio apartments equivalent to the number of studio apartments being demolished to house essential workers, single people etc that a part of the Paddington community.
- That construction vehicles should access the site from Oxford Street and not from the local roads. Glenmore , Liverpool and Shadforth Street

Please contact if you require additional information or have any questions.

Ruth Daniell

16 March 2026

ANNEXURE A - PHOTOMONTAGES

5.4 VIEWPOINT POSITION 01 - Oxford Street (southern footpath at Glenmore Road intersection)

ORIGINAL PHOTOGRAPH



180 Oxford Street, Heidelberg, NSW - Visual impact photomontages and methodology report - 4th February 2025

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5.5 VIEWPOINT POSITION 01 - Oxford Street (southern footpath at Glenmore Road intersection)

ORIGINAL PHOTOGRAPH WITH PROPOSED DEVELOPMENT



180 Oxford Street, Heidelberg, NSW - Visual impact photomontages and methodology report - 4th February 2025

Page: 3

View from the Collier Visual Impact Assessment. The assessment in this report relies heavily on the Plane trees to be in leaf. London Plane trees in Sydney are deciduous and generally lose their leaves for about 3 to 4 months of the year, from April/may to late August.

6.4 VIEWPOINT POSITION 02 - Oxford Street (southern footpath near Victoria Barracks main entrance gate)

ORIGINAL PHOTOGRAPH

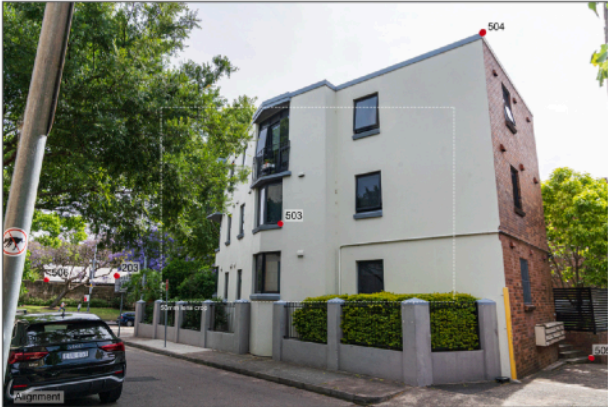


6.5 VIEWPOINT POSITION 02 - Oxford Street (southern footpath near Victoria Barracks main entrance gate)

ORIGINAL PHOTOGRAPH WITH PROPOSED DEVELOPMENT



ALIGNMENT OF SURVEYED POINTS



ORIGINAL PHOTOGRAPH WITH PROPOSED DEVELOPMENT



ALIGNMENT OF SURVEYED POINTS



ORIGINAL PHOTOGRAPH WITH PROPOSED DEVELOPMENT



ANNEXURE B Extract from the WDCP C1.4.9 Views noting that the diagrams are not intended to represent all significant views and vistas.

► Part C | Heritage Conservation Areas

C1 | Paddington HCA

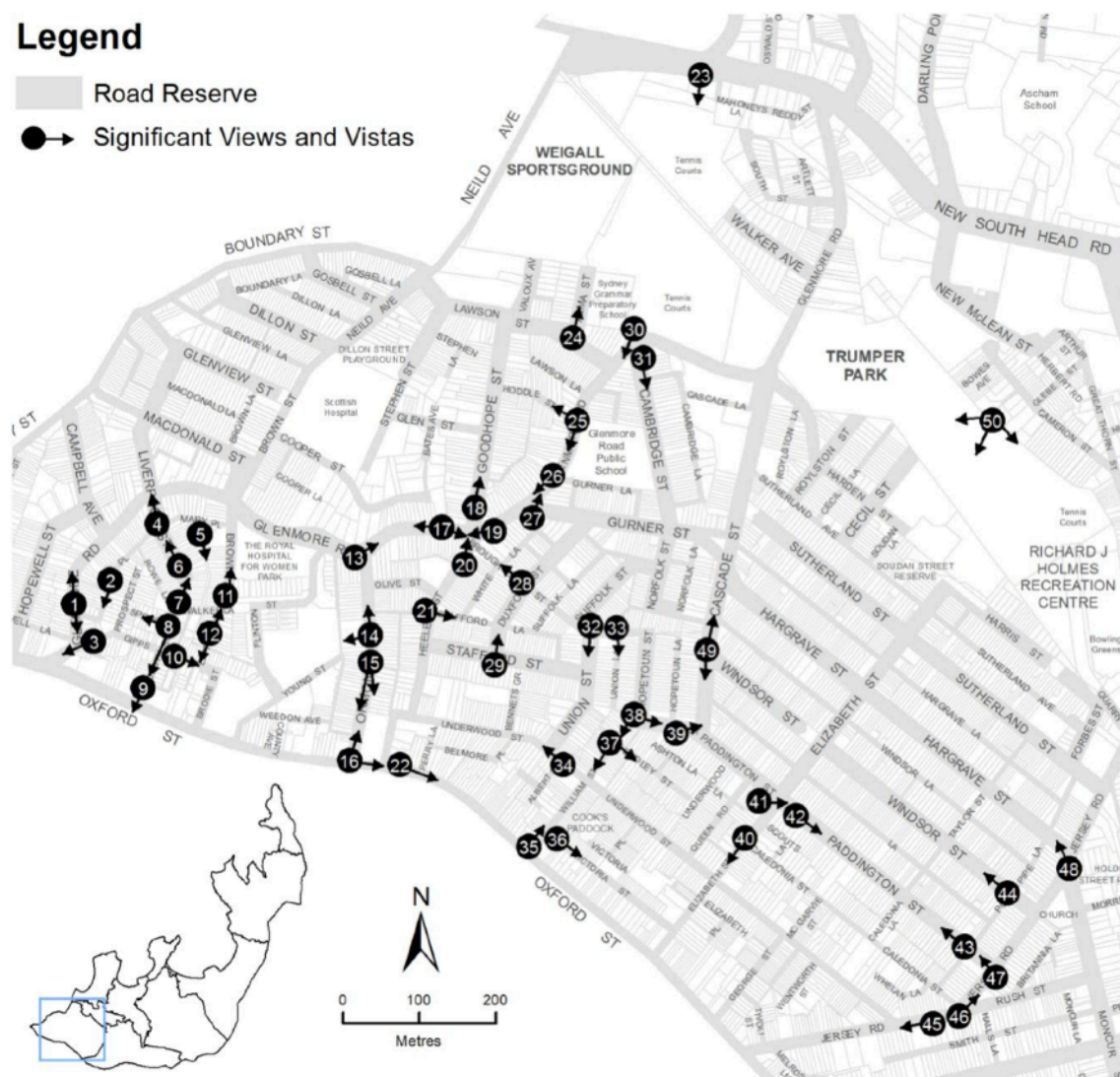
Significant views and vistas

MAP 2 Significant views and vistas

Note: The following diagrams show a selection of significant views and vistas. These diagrams are not intended to represent all the significant views and vistas.

Legend

-  Road Reserve
-  Significant Views and Vistas



Significant views and vistas

- 1 (a) Glenmore Road - View north from Mary Place
(b) Glenmore Road - View south to Gipps St corner
- 2 Mary Place - View south
- 3 Gipps St - View to Oxford St from Bethel Lane
- 4 Liverpool St - View north from Mary Place
- 5 Laneway west of Brown St - View from Mary Place
- 6 Liverpool St - View north
- 7 Liverpool St - View north from Rowe Lane
- 8 (a) Spring St - View from Shadforth St to Prospect St
(b) Shadforth St - View to Oxford St from Spring St
- 9 Shadforth St - View to Oxford St from Gipps St
- 10 Gipps St - View east from MacLaughlin Pl
- 11 Brown St - View north from Walker Lane
- 12 (a) Elfred St - View from Walker Lane to the south
(b) Elfred St - View north
- 13 Glenmore Rd - View east from Ormond St
- 14 (a) Ormond St - View north
(b) Ormond St - View to the front wall of Engehurst
- 15 (a) Ormond St - View south-east
(b) Ormond St - View south
- 16 (a) Oxford St - Looking west from Ormond St
(b) Ormond St - View from Oxford St
- 17 (a) Glenmore Rd - View west from Five Ways
(b) Five Ways - Looking east from Glenmore Rd
- 18 Goodhope St - View north from Five Ways
- 19 Five Ways - View west along Glenmore Rd
- 20 Five Ways - View north from the corner of Heeley St
- 21 Olive St - View from Heeley St
- 22 Oxford St - Looking west from Underwood St
- 23 Paddington from New South Head Rd
- 24 Alma St - View from Lawson St
- 25 (a) Hoddle St - View west from Glenmore Rd
(b) Glenmore Rd - Looking south from Hoddle St
- 26 Glenmore Rd - Looking south to the corner of Gurner St and Five Ways
- 27 Corner Glenmore and Gurner Rds - Looking north
- 28 Broughton St - View to Five Ways
- 29 Stafford St - View from Duxford St
- 30 Corner of Glenmore Rd and Cambridge St
- 31 Cambridge St - View from Glenmore Rd
- 32 Union St - View from Broughton St
- 33 Union Lane - View from Broughton St
- 34 Underwood St - View from William St
- 35 William St - View north from Victoria St
- 36 Victoria St - View to Elizabeth St
- 37 (a) William St - View from Duxford St looking south
(b) Dudley St - View from William St
- 38 (a) William St - View south from Paddington St
(b) Paddington St - View from William St
- 39 Cnr Paddington St and Cascade St - View east from Paddington St
- 40 Elizabeth St - View south from Caledonia St
- 41 Paddington St - Close view from Elizabeth St
- 42 Paddington St - Looking east from Elizabeth St
- 43 Paddington St - View east from Jersey Rd
- 44 Windsor St - View west from Point Piper Lane
- 45 Jersey Rd - Looking south from Underwood St
- 46 Jersey Rd - View north from Rush St
- 47 Cnr Paddington and Jersey Rds
- 48 Cnr Jersey Rd and Hargrave St
- 49 (a) Cascade St - View north from Windsor St
(b) Cascade St - View south from Windsor Lane
- 50 Trumper Park - Panoramic view

ANNEXURE c - ARCHAEOLOGY

THE UNDERGROUND STONE BASEMENT AT No. 142 OXFORD STREET & ON THE SITE OF NOS. 142-148 OXFORD STREET PADDINGTON

1. Bill Morrison, Managing Director, Conybeare Morrison International:

(Bill is an architecture and urban design firm he co-founded with Darrel Conybeare) stated that "Number 142 (Oxford Street) is built over a disused sandstone basement which was possibly used as a cool room in the early days of the construction of the Victoria Barracks. This basement is little known, and is not part of the dwelling above, but is of extreme historical significance and requires detailed archaeological investigation. There may be similar basements beneath the other townhouses."

Bill Morrison recommends a specific heritage study.

2. Brad Swanson, Arc (a builder):

"As requested, here's a brief factual summary of what I know about the subterranean space below the carpark of the 1980s development of the brick terraces on Oxford Street, Paddington. This is based solely on observations from previous renovation work to adjoining properties.

- The 1980s building includes a large, shared basement structure that extends below the garage of 13 Gipps, the shared carpark space behind 15, 17, 19 & 21 Gipps and under the carparks of 142 - 148 Oxford St.
- I observed an active groundwater management system within this space.
- The presence of this system suggests ongoing ground water movement and a system that requires continuous/routine maintenance.
- Access to the basement services has previously required coordination across multiple property boundaries, as the structure spans under several lots.

A photograph of the basement below No. 142 Oxford Street is shown in the following photograph.



View of the historic Underground Basement below No. 142 Oxford Street Paddington, which predates the construction of the 1980s town house. Source: Photograph from the sale of No. 142 Oxford Street Paddington. Note the sandstone blocks under the render on the left hand wall. 2012. Source: realestate.com.au