

5 November 2021

Julie Prentice
Specialist Planner, Strategic Planning and Urban Design
City of Sydney
GPO Box 1591
SYDNEY NSW 2001

By email: jprentice@cityofsydney.nsw.gov.au

Dear Ms Prentice,

National Trust submission relating to Oxford Street Cultural and Creative Precinct

Thank you for the presentation made by yourself and other Council Staff to the National Trust of Australia (NSW) on 19 October 2021 to provide an introduction to this proposal. Since that time we have reviewed the documentation made available and assessed what this Planning Proposal will mean - through proposed changes to the City of Sydney LEP and DCP 2012 - to one of Sydney's most significant streets. **On the whole, the National Trust is extremely concerned with this planning proposal and the effect it will have on both the historic past and the future potential of Oxford Street, and we recommend this proposal be withdrawn in its entirety.**

The National Trust acknowledge that Oxford Street has been undergoing a period of decline for many years, and that action is required to address this issue. There is a very real danger however that this Planning Proposal will continue this decline by forever altering the unique character that this street already has, and which must be the basis for any "reimagining".

The National Trust oppose this proposal on the basis that:

- A blanket addition of two additional storeys across the entire precinct in exchange for 10% of the gross floor area within a building for creative uses is at best a temporary solution to a problem that will have a lasting and destructive impact on almost every single historic building in this precinct. In 10-50 years' time the uses will have changed (like they always do) but the new additions will remain.
- The proposal involves zero works to the actual street which must be at the core of any street upgrade in terms of its traffic and transport arrangements and public domain amenity.
- The proposal is accompanied by a great deal of documentation – the majority of whose recommendations and evidence do not justify or support the outcome.
- It would appear that many changes including the making of additions (particularly to the rear) to historic buildings can already occur under existing planning controls that have already been carefully formulated to preserve the amenity, significance and historic integrity of Oxford Street, particularly at the Paddington end.
- The need for 10% of a building's floor area to be dedicated to "cultural and creative floorspace" to trigger increased development potential will, in order to make a meaningful space for such pursuits, lead to property amalgamations that will further erode the "fine grain" nature of Oxford Street (particularly to the rear elevations) which is identified as one of its positive attributes.

This submission outlines our concerns in further detail.



A unique street

The “Comparative Analysis” (Section 4) of the Heritage Study identifies numerous other streets in Sydney, many of which, including Cleveland Street, Crown Street, King Street (Newtown) and Glebe Point Road are all noted as being typically low-rise and fine grain yet, in the conclusion of the comparative analysis, Oxford Street is found to be unique among the streets of Sydney:

“The Oxford Street Activity Precinct S3 is unique among the rest of the activity precincts in this comparative analysis. This uniqueness is primarily due to the physical and historical context of the precinct...”

Oxford Street still retains the character and history of its earliest years...

There is no other precinct in this comparative study that contains such an extensive number of buildings on tapered corner lots. Oxford Street’s orientation, and the way it diagonally intersects with other streets and creates triangularly shaped corner lots is unique. The result is a historic buildings with tapered corners...

Oxford Street demonstrates a unique streetscape unlike any other in the comparative study...

Oxford Street now has a collection of the most diverse building typologies ranging from Victorian commercial terraces, federation era buildings, inter-war and art Deco expressions, and a mix of low-rise, low-density built forms to medium to high rise, high density apartment buildings.”¹

Section 5 of the Heritage Report then outlines all of the ways in which Oxford Street meets every criteria for assessing heritage significance using Heritage NSW assessment criteria and guidelines including historic, aesthetic and cultural significance. The assessment concludes that **“as one of Sydney’s earliest main roads and possibly Australia’s first ‘highway’, Oxford Street displays layers of historical development that, when combined, create a cultural and historic landscape unique to Sydney.”**²

This description of the place is reinforced in the report prepared by the City’s own Transport, Heritage and Planning Committee which notes:

*“The land use, heritage and built form diversity of the area contributes significantly to its character... As one of Sydney’s earliest main streets of the 1840s, the street is characterised by Edwardian, Victorian, Art Deco, Inter-War and Federation style architecture, including institutional buildings, theatres, commercial buildings, council reclamations, public conveniences and open spaces including Taylor Square. **The largely consistent and intact streetscape comprises buildings with robust materiality, elegant proportions and fine detailing.**”³*

All of this would seemingly support maintaining and preserving this unique streetscape and its buildings, however in the Conservation Management Strategy (Section 6 of the heritage report) this is apparently forgotten as the report seeks to justify this unacceptable proposal for adding height and floor space on top of every historic building – even State-listed items such as the G.A. Zinc & Co building at 56 Oxford Street with its unique parapet. This is truly a one-size-fits-all approach that will end up completely altering all of the very features identified above that give this street its unique character.

¹ Curio Projects, *Oxford Street Heritage Study*, 2021, Section 4.2.9

² Curio Projects, *Oxford Street Heritage Study*, 2021, Section 5.1

³ City of Sydney, *Transport, Heritage and Planning Committee Report*, 10 May 2021



Heritage Significance

The area under consideration is without question one of great historic and cultural significance, with most of the precinct identified as a heritage conservation area. Of the 161 properties in the precinct, 132 (over 80%) are listed as contributory buildings and 52 are listed as individual local heritage items.⁴ The Curio report recommends further listings and the National Trust would support such aims.

The National Trust has some very real concerns however with the heritage advice put forward and/or the outcomes that are recommended in this proposal.

The National Trust has not read all 500 pages of the heritage study for this proposal prepared by Curio Projects, however we note that it aims *“to help formulate controls for future developments aimed at maintaining the existing character and heritage significance of the Oxford precinct whilst considering on balance the need to stimulate economic activity.”*⁵

Despite its length, this report offers little insight into an actual heritage analysis of this planning proposal. It delivers a history of the area, includes many photos of the place and its buildings, notes if buildings are significant or contributory, and even dedicates 123 pages to an entirely useless study comparing existing buildings in the precinct to other examples of similar architectural styles in the rest of Sydney.

Critically, what the heritage report for this proposal does not do, is address the CUMULATIVE IMPACT of this very real proposal to add floor space on top of this entire historic precinct.

Make no mistake, this planning proposal will, if enacted, completely destroy the celebrated fine grain and historic character of Oxford Street by completely removing the ability of every single historic parapet to be seen against the sky and for this street to be seen as a unique collection of building types and styles that has evolved over time. Whatever controls the Council may wish to implement to ensure that historic interiors and structural elements are maintained in these old buildings, the result for the street will be the largest and most continuous example of facadism in NSW.

This proposal treats the entirety of this historic precinct simply as a podium. The Darlinghurst Courthouse appears to be the only building that will be spared this injustice, but this is offset by a separate proposal to increase the heights of buildings in Taylor Square – a place of existing unique identity and character defined by its open, spacious nature.

The Conservation Management Recommendations (Section 6.2) in the heritage report are numerous and well-founded, and the National Trust would completely support advice such as this which is outlined in the document:

- *Preservation of the historic character of the surviving contributory buildings within the precinct should be a paramount consideration when assessing the impact of any contemporary additions.*
- *Change to built fabric... should be kept to a minimum*
- *The historic character and legibility of the precinct and its individual buildings and spaces shall be maintained...*
- *New development should not visually dominate the built fabric of the original building nor the streetscape...*
- *Where infill is proposed the design should be developed with careful analysis and evaluation of the historic context of the surrounding buildings...*

⁴ Curio Projects, *Oxford Street Heritage Study*, 2021, Section 1.4 (unpaginated). Note that the Executive Summary of Volume 2 states there are 53 individual items.

⁵ Curio Projects, *Oxford Street Heritage Study*, 2021, Volume 2 Executive Summary



- *Modern infills should not dominate the character of the streetscape which is currently a rich mixture of styles...*
- *Consider public domain views from the street level in determining the height of additions so that a substantial portion of the new addition is concealed and does not dominate or impact the views of the heritage fabric...*
- *Protect and preserve significant architectural features above roof level that contribute to the character of the individual buildings...*

None of this advice has been followed in preparing the proposed “recommended built form envelope” for any elements of the proposal, and Block 12, shown as an example below. The mere act of “stepping” new elements up and down does nothing to alleviate these impacts to these historic buildings and their context.



Block 12 today – A unique and intact row of predominantly Victorian-era shopfronts with a variety of heights and parapets outlined against the Sydney sky. An essay in three-dimensionality, and an almost completely intact street elevation above the continuous awning which presents a blank canvas awaiting imaginative re-use for the next part of its history. (Source: Google Maps)



Block 12 tomorrow – Recommended Built form envelopes have removed the ability for every single building to be read as an individual piece of creative expression. The once interesting streetscape reduced to a two-dimensional façade for its entire length. (Source: Studio Hollenstein)



The National Trust are concerned that the heritage report is full of seemingly contradictory advice. Take the below example which notes that 82-106 Oxford Street is a “visually intact” example of a building in a “consistent Federation style” which exhibits a “singular solid massing” and whose “façade demonstrates a high level of consistency” – in other words, it is a good example of its type with identifiable features. The analysis then goes on to note that distinct elements, including the parapet, “should be retained to maintain a (sic) heritage significance”.

Despite this analysis, it then identifies the opportunity for this site is **“for the entire block to serve as a podium for level additions.”** It states that “to retain the character of the block” there should be a “setback to ensure the recognisable roof features are not dominated by any additions”, and recommends that “additions should be in harmony with the original building.”

The Studio Hollenstein massing for this building, assumed to be informed by this heritage advice, then shows what the proposal intends. This proposal places an extremely clunky, horizontally dominant, stepped box on top of this building, with the catch-all note on the bottom of the page that *“Additions to heritage items and contributory buildings will be subject to Heritage Impact Assessment.”*

It is hard to contemplate how any genuine and impartial Heritage Impact Assessment following the recognised guidelines for such a document could justify such a proposal.

Oxford Street: Heritage Study 2021 Conservation Management Strategy			
6.1 Constraints, Opportunities & Recommendations			
Block 7			
	Constraints	Opportunities	Recommendations
	Character, Siting, Form, and Scale The vertical external built fabric of 82-106 Oxford Street, Darlinghurst (Fig 6.32 & 6.33) is visually intact. The entire Oxford Street facing block is in a consistent Federation style architecture occupying the limit of its property boundaries and exhibiting a singular solid massing. The old properties on site were agglomerated during the resumptions into a large lot. The current grain of the resulting buildings is substantially different compared to the properties on the opposite side of Oxford Street. The building height is consistent of the sloping terrain through its stepped form design. The historic character evoked by the buildings on the block should be respected and retained. The built fabric is related specifically to the Oxford Street widening and the ensuing resumptions that followed.	Podiums There is an opportunity for the entire block to serve as a podium for level additions. To retain the character of the block, a clear separation of the original buildings from level additions should be maintained with a setback to ensure the distinction and make sure the recognisable roof features are not dominated by any additions. The contemporary apartment towers on Block 2 can be the precedent for setback for new level additions. This accentuates and gives clear distance from the parapet line of the heritage item and further highlights its original form and scale.	Review of FSR and Height Limits Current FSR and height limits permitted by the Sydney LEP and DCP require review with consideration of setbacks for additions. The vertical limit prescribed by the Sydney LEP for properties comprising 82-106 Oxford Street, Darlinghurst is fifteen (15) meters or three (3) storeys by the Sydney DCP.

Fig 6.32: View of 82-106 Oxford Street, Darlinghurst's corner at the intersection of Oxford and Piccadilly Streets



Heritage “constraints, recommendations and opportunities” assessment of 82-106 Oxford Street (above) and the resulting recommended addition (below) that obscures the entire form of this federation-era parapet line yet apparently is set back “to ensure the recognisable roof features are not dominated by any additions”. (Sources: Curio and Studio Hollenstein)

In relation to the above, the National Trust also note the particular advice in section 6.2 of the heritage report relating to “scale, form and alignment”. The report states that *“the original scale and form of all buildings within the precinct should be retained where possible”* and goes on to give particular advice regarding podiums.



The heritage report notes that “where podiums are encouraged, additions to contributory buildings should follow a uniform setback to highlight the original scale and form of the original building. Figure 6.225 shows an example of an addition demonstrating substantial setbacks, and a design that compliments the original building.”



Podium example from the heritage report (above) showing a modest single storey attic addition with an angled roofline to a five storey building of substantial height in Paris and a “stealth” addition to a building in New York, compared to the recommended built form for Block 8 (below), the majority of which involve additions equal in height to the original buildings themselves. (Sources: Curio and Studio Hollenstein)

The example of the *Offices Vivienne* by MAAST Architects in the Bourse district of Paris is indeed an acceptable example of a well-executed addition to a historic building, but it is in no way relevant to the planning proposal as executed. This building involves a modest single storey addition that is clearly recessive to the original building, whereas the proposal recommends two additional stories set above the existing building top floor ceiling of every building, regardless of its height, position, detail or context. In many cases the Oxford Street proposal recommends additions equal in height to the original building itself.

It is hard to imagine Paris allowing such unsympathetic change to its historic buildings.

Recommendation: The existing heritage report in no way actually assesses the heritage impact of this planning proposal which involves substantial change to almost every single historic building in a precinct almost entirely covered by conservation areas and which contains no less than 132 contributory buildings and 52 individually listed local heritage items.

The National Trust recommend that a new heritage assessment of the actual proposal (including the recommended built forms put forward in the Oxford Street Urban Design Study by Studio Hollenstein) be undertaken by an independent heritage expert to assess the true, cumulative heritage impact of this proposal on this historic precinct.



Rear lanes

There is no question that, in some cases, the very deep nature of the building lots may permit development to the rear that would not affect the most significant parts of Oxford Street's built form. The National Trust also acknowledges that certain streets most definitely have room for improvement in terms of their built form and urban amenity although as the heritage report notes, any works to these rear elevations should highlight their original scale.

There is a very real concern however with the buildings in the proposal that are located within the Paddington area that the rear forms of these terrace shops are just as intrinsic to the scale and form of the place as the front elevations.

Recommendation: The new independent heritage assessment of this proposal recommended above must also include assessment of the rear elevations of these properties and their context, particularly in the Paddington area.

Floor Space

At its core this proposal, bizarrely, seeks to address the issue of high vacancy rates by building more floor space. Specific recommendations are made in the study documents that highlight the type of spaces required or desired for cultural and creative pursuits, yet the proposal's arbitrary 10% allocation is unlikely to deliver such results. Any developer would be happy to have an increased floor area that is then 90% lettable – and the result of a blanket addition of floor area across the precinct will simply be a 10% vacancy rate reflecting all of these unsuitable “allocations” for creative floor space scattered throughout the precinct.

Analysis of this kind is not the area of the National Trust's expertise however we note that in the *Oxford Street Floorspace Supply and Demand Study* by SGS, it was identified that:

- If current trends (post covid) continue, by 2036 there will be an oversupply of retail floorspace the precinct of around 2,774 square metres⁶
- Based on normal (non-covid) forecasts by 2036 there may be a need for an additional 5,565 square metres of office-based floorspace and 3,910 square metres of creative industries floorspace in the precinct.

Critically, this report concluded that “**there is not likely to be a significant need for additional floorspace in the precinct to meet projected total demand, but a small amount of additional office and creative floorspace capacity over this period is likely to be needed**”⁷ (bold text by consultant).

Recommendation: Just as Oxford Street was progressively widened in 1908 for new electric trams that are no longer in place, the National Trust is deeply concerned about the long-term legacy of this proposal in terms of its impact on built form. While “cultural and creative” uses may be the incentive now, it will not be the use for these buildings in 100 years, yet the historic built form of this street will be destroyed forever.

The City of Sydney itself has identified that the precinct contains 183,171sqm of employment floor space, with only 9,268sqm in use by creative industries and 29,924sqm vacant.⁸ This would mean that, by simply using existing building floor space, the required additional office and creative floorspace capacity can readily be achieved. The City should focus its planning efforts on encouraging and facilitating the use of this existing floor space in existing buildings, not building new ones.

⁶ SGS Economics & Planning, *Oxford Street Floorspace Supply and Demand Study*, March 2021, p.v

⁷ Ibid, p.vi

⁸ City of Sydney, *Oxford Street Cultural and Creative Precinct planning Proposal*, July 2021, p.4



Street Upgrades

Oxford Street is a street brimming with potential and it would be wonderful to see it as a vibrant location full of life generated by both daytime and night-time activity, however there is a great gap between what this proposal seeks to achieve and what it will deliver. The Executive Summary notes that *“the proposals fit within a broad context for change proposed for Oxford Street by the City to address the public domain and improve conditions for walking, cycling and the enjoyment of the street”*⁹ yet, as was confirmed in our meeting with the City of Sydney, this proposal involves absolutely no works to Oxford Street itself which is designated a State Road. **Surely one of the key elements of any proposal to upgrade Oxford Street must be to actually undertake some work to Oxford Street.**

In the Site Analysis undertaken by Studio Hollenstein it is noted that Oxford Street is a *“key vehicular and pedestrian path to and from Central Sydney (where) the volume of traffic is a significant noise source and reduces your sense of safety when standing on the footpath.”*¹⁰ This conclusion is reached by the Council itself whose Transport, Heritage and Planning Committee report notes there is *“potential to accommodate more efficient transport to increase space for people and improve amenity by encouraging cycling, rerouting traffic and reducing speed.”*¹¹

It is therefore astounding that such a broad proposal to upgrade Oxford Street as a *“key cultural centre within the Eastern Creative precinct”*¹² would not involve a single change to the pedestrian amenity, vehicular lanes, public transport, bicycle paths, paving, lighting, street furniture or landscaping of the street. Works to the street itself must be the first step in any project that has identified such *“potential for place-making.”*

The Heritage Study for the proposal notes that *“the treatment of ground plane shopfronts, including signage, must be more appropriately managed within the precinct”*¹³ and the Trust would agree with this practical recommendation.

Recommendation: Any proposal for an Oxford Street Creative and Cultural Precinct must of necessity involve works to upgrade the actual street. The cooperation of the State Government who, according to Council, actually control Oxford Street is therefore paramount and must be sought. The current proposal will do absolutely nothing to improve the conditions of the street for those people who actually use it.

The National Trust disagree that a review of the planning controls should be *“the first strategic move proposed for Oxford Street”* but instead recommend that the initial focus should be as per the other recommendations of the Transport, Heritage and Planning Committee¹⁴ to focus on:

- the long-term improvement of public domain on Oxford Street including a strategic revision of the street's public domain and reconsideration of the street's movement functions to improve amenity and conditions for walking and cycling;
- more efficient transport and reduced traffic speeds on Oxford Street to free up space for people, improve amenity and conditions for walking, increase safety, decrease noise, and make Oxford Street a more inviting and comfortable place;
- further improving the amenity of Oxford Street by advocating for the consolidation of the buses, electrification of the bus fleet and re-rerouting of traffic to purpose built arterial roads.

⁹ City of Sydney, *Oxford Street Cultural and Creative Precinct planning Proposal*, July 2021, p.4

¹⁰ Studio Hollenstein, *Oxford Street Urban Design Study*, 27/04/2021 p.7

¹¹ City of Sydney, *Transport, Heritage and Planning Committee Report*, 10 May 2021

¹² City of Sydney, *Oxford Street Cultural and Creative Precinct planning Proposal*, July 2021, p.4

¹³ Curio Projects, *Oxford Street Heritage Study*, 2021, Volume 2 Executive Summary

¹⁴ City of Sydney, *Transport, Heritage and Planning Committee Report*, recommendations 32-35 to “improve Oxford Street through planning, transport and public domain”, 10 May 2021



Cultural and Creative Uses

The National Trust agree that the creative sector is vital to Sydney's future. In 2020, the City commissioned a Cultural Activity Study and a Floor Space Supply and Demand Study for the Oxford Street precinct to determine the locational and operational needs of creative businesses and the demand for floor space. Both studies *"conclude that rents for cultural and creative uses in city fringe locations like Oxford Street can be unsustainable for most creative operators to afford"* and that the available existing floor space (noting shopfronts in particular) *"is not necessarily fit for purpose for different types of creative and cultural uses."*¹⁵

Critically these studies concluded that *"creative manufacturing uses where producers make artworks or rehearse performances **may require spaces that are more like warehouses** with larger floorplates and higher ceilings"* and that *"that more diverse and affordable models of creative space should be incentivised in the precinct and **ways of reworking existing vacant space explored.**"*¹⁶ Nowhere in these recommendations is it suggested that dedicating a paltry 10% of new floor space will provide the spaces required for creative uses to occur.

For 10 years between 2009-19 "Renew Newcastle" was a major catalyst for renewal in Newcastle creating change from the ground up, enabling a structure to enable temporary activation of underutilised space by removing the barriers to entry, lowering the cost and complexity of participation, and encouraging artistic risk by allowing people to try new creative ideas.¹⁷ During that time 82 properties were activated with 264 participants, of which 174 participants have gone on to operate successful businesses. According to a 2017 report compiled by the Centre of Full Employment and Equity at the University of Newcastle, every dollar invested in Renew Newcastle in 2016, generated fourteen-times that in economic benefit to the city. The report noted that:

*"Renew has been instrumental in the establishment of similar initiatives in cities around Australia and around the world. Indeed Renew's national and international reach has promoted Newcastle as not only a model of revitalisation, but as a place of creativity and a popular tourist destination."*¹⁸

Oxford Street does not require yet more underutilised floor space, or new bespoke buildings that will drive higher rental returns. It requires affordable places and creative thinking to deliver a creative precinct. This can start with a scheme to subsidise the use of existing historic, vacant, interesting buildings to encourage creative pursuits.

Recommendation: To generate a true cultural and creative precinct in Oxford Street it is clear that the City must address both the type and the affordability of space available. It would appear that other incentives, using existing vacant floor space, can help drive this change. Options for addressing the need for affordable, appropriate space for creative industry must first surely be looked for within the existing vacant buildings.

Existing Controls

Council's own report notes that *"key existing planning controls address height, floor space and heritage conservation."*¹⁹

Recommendation: Significant improvements to Oxford Street could be achieved whilst simply retaining existing planning controls.

¹⁵ City of Sydney, *Transport, Heritage and Planning Committee Report*, recommendation 40, 10 May 2021

¹⁶ City of Sydney, *Transport, Heritage and Planning Committee Report*, recommendation 41, 10 May 2021

¹⁷ <https://renewnewcastle.org/>

¹⁸ <https://renewnewcastle.org/news/a-haven-for-progress/>

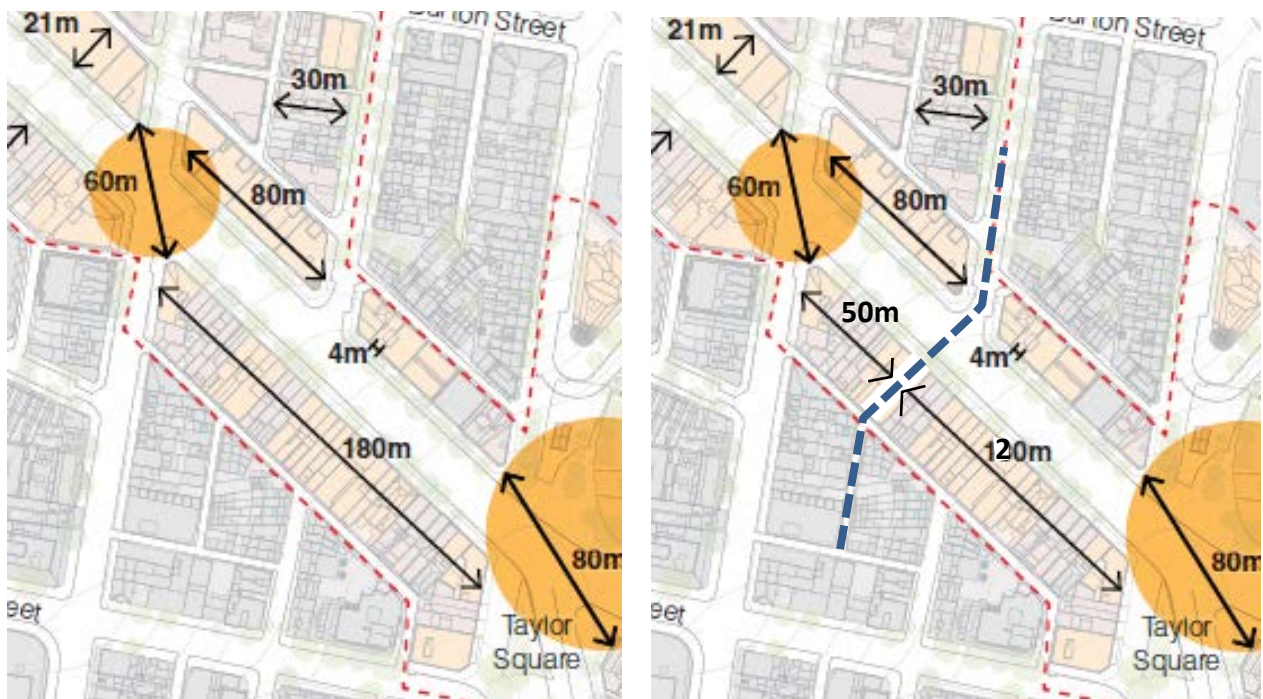
¹⁹ City of Sydney, *Transport, Heritage and Planning Committee Report*, 10 May 2021



Opportunities

Sadly, this planning proposal sees the only solution to many of Oxford Street's problems is only to "add" when many immediate solutions may in fact be addressed by simply using what it already there, or in some cases actually "subtracting".

The Studio Hollenstein report noted in its Context Analysis that *"there are a number of very long blocks, up to 180m which isolate their rear lanes from the activity and opportunities of Oxford Street"*²⁰ with the block between Crown and Bourke Streets being the longest. This issue is also noted in the Heritage Report which states that Little Oxford Street *"can only be accessed via Crown and Campbell Street, and with no direct site-through public access from Oxford Street presents a challenge in terms of pedestrian permeability."*²¹ A quick planning study would indicate that the best way to reduce a block length is of course to introduce a street, and the potential exists to connect, for example, the residential area of Ryder Street and Little Oxford Street to Oxford Street – aligning with the Palmer Street intersection. The Heritage Report notes that Ryder Street in particular contains *"small quaint terraces with immense character and streetscape appeal, unique to the area"*²² yet this planning proposal offers no way of engaging with this space.



The long block between Crown and Bourke Streets (left) is identified as isolating the rear lanes from Oxford Street. The creation of a new street (right) is a simple way to address such issues and to create new opportunities for connection. (Source: Studio Hollenstein with National Trust overlay)

Recommendation: This sort of incision, carefully executed and appropriately considered, is the kind of intervention that the City can make to actually connect the rear lanes and their occupants to the activity and opportunity of Oxford Street.

The City of Sydney should consider options that actually involve "place making" as a reality rather than just as a concept.

²⁰ Studio Hollenstein, *Oxford Street Urban Design Study*, 27/04/2021 p.8

²¹ Curio Projects, *Oxford Street Heritage Study*, 2021, section 3.7.1

²² Curio Projects, *Oxford Street Heritage Study*, 2021, section 3.7.2



Conclusion

Our cities do grow and change over time, but they take a long time to get to the point where we start describing them as having “character” and that is something to be closely protected for it can be lost in an instant. The City of Sydney, in many respects, has in recent times led the way in terms of responding to heritage in an innovative yet thoughtful way that celebrates the best of the old with the possibility of the new. The protection of Paddington itself is a measure of this success in general terms.

It is the unique elements and the fine-grain nature of today’s historic Oxford Street that can and must form the basis of the Oxford Street of tomorrow. The National Trust object to this planning proposal on the basis that it will destroy the very qualities that must form the basis of the revitalization of Oxford Street.

The National Trust would argue that this proposal will have an unacceptable and long-term heritage impact on the heritage significance of Oxford Street, and any revitalization of Oxford Street can and must begin with the public domain and the street itself.

Yours sincerely,

David Burdon
Director, Conservation