

Matthew Girvan
Planning Officer
City of Sydney
Sydney NSW 2001

By Email: dasubmissions@cityofsydney.nsw.gov.au

13 January 2022

Dear Mr Girvan

Re: DA: D/2021/1550: 82-106, 110-122, and 56-78 Oxford Street DARLINGHURST NSW 2010

The National Trust has previously made separate submissions in December 2020 in relation to the following proposals:

- D/2020/1071 (82-106 & 56-78 Oxford Street DARLINGHURST NSW 2010)
- D/2020/1072 (110-122 Oxford Street DARLINGHURST NSW 2010)

In those submissions we noted our great concern for the extensive proposals to demolish wholesale the interiors of a 250m section of Oxford Street. Both of those proposals were lodged on 15 October 2020 and (according to Council's website) are still under assessment.

Since that time the National Trust has also expressed its very serious concerns with the City's proposed "*Oxford Street Cultural and Creative Precinct*" Planning Proposal which will - through proposed changes to the City of Sydney LEP and DCP 2012 - have a lasting and destructive impact on the very character of Oxford Street which the precinct purportedly seeks to build upon. This Planning Proposal of course also relates directly the properties at 82-106, 110-122, and 56-78 Oxford Street.

The heritage impact of a proposal on these buildings must form a major part of any assessment, yet now appears to be the subject of an early works package. The new proposal (D/2021/1550) is for "*preparatory early demolition works to existing heritage buildings*" and includes:

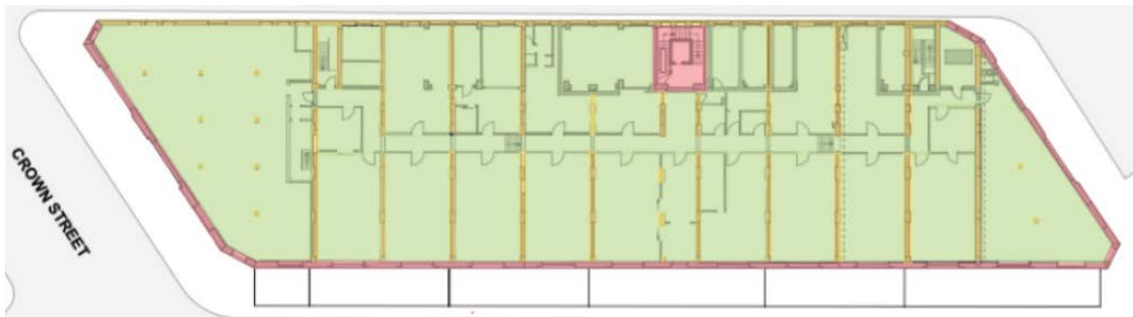
"demolition of non-heritage significant ceilings, internal walls, floor and wall linings, demolition, excavation and structural footing works... removal of existing internal and external redundant services, associated structural works, removal of shopfronts and windows and erection of scaffolding around each building to allow cataloguing of all windows and inspections of existing bricks and sandstone."

In other words, this proposal is for a near complete strip out of these existing buildings. The Trust are concerned that the revised Heritage Impact Statement by Urbis states that "*The scope of these early demolition works has been informed by conversations and consultation with Council staff throughout the assessment process of the two original applications, and reflect Council's recommended demolition scope issued in the draft conditions for those applications.*"

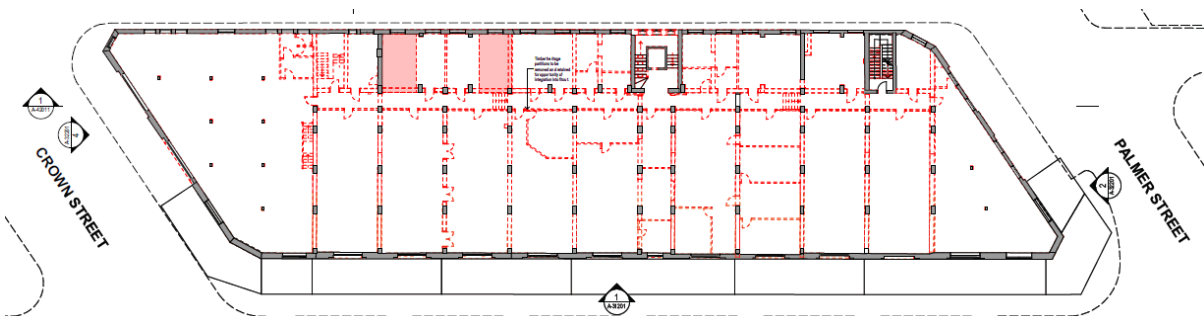


The National Trust objected strongly to the extent of demolition in the earlier proposal, and did not agree with the Heritage Impact Statement that wholesale demolition of the interiors as part of a *“strategic reordering of the interior upper floors of all buildings to provide suitable contemporary accommodation”* was an acceptable heritage outcome. The revised design (below) clearly reflects that this was a legitimate concern.

The revised Heritage Impact Statement (also by Urbis) states that the *“largely reversible”* removal of original fabric in this application can now be supported as it *“will allow for the ongoing legibility of the original forms, dimensions, spatial volumes, and fine-grain arrangements of the buildings / tenancies, while facilitating future uses commensurate with their nature as purpose-built commercial buildings.”* While the extent of demolition has been reduced, to describe demolition of original fabric as “reversible” does seem to be a questionable approach to conservation – fabric is only original once, and it would be wrong to assume the majority of this material will be stored for later reinstatement.



Earlier Group 2 First Floor Heritage Significance grading diagram (Source: Urbis CMP)



Earlier Group 2 First Floor demolition plan (Source: FJMT Drawing A22103/DA01)



Revised Group 2 First Floor demolition plan (Source: FJMT Drawing A22103/DA04)



The National Trust of course has no objection to proposals in this or the earlier applications for certain works that can be supported in heritage terms (such as the removal of non-original shopfronts, or paint from the brick facades) and the injection of life and the long-term revitalisation of our Main Streets is something the Trust genuinely support. **The issue at stake here however is that a substantial amount of demolition work that will have a heritage impact is to be undertaken before the proposed works which make this necessary are even approved.**

As the Trust noted in its earlier submissions, the buildings of 56-78, 82-106, and 110-112 Oxford Street Darlinghurst form part of the *East Sydney/Darlinghurst Urban Conservation Area*, listed by the National Trust in April 1981 (originally proposed May 1976) and the *Oxford Street Urban Conservation Area*, listed in February 1980.

The major concern with the original proposal was the unimaginative way in which existing heritage buildings and their internal fabric were been dealt with in order to accommodate a new use. These are not simply shells, like the backdrop to a movie set – they are buildings, mostly over 100 years old, that gain some of their significance from their interiors, and certainly gain their physical support from their internal walls. The National Trust consider “facadism” a poor heritage outcome, and recognise that historic interiors form part of the significance of a building, not just their external elevations. Where they remain, historic interiors should be engaged with in an inventive way and celebrated.

There is also the fact that such wholesale demolition leaves little in the way of discovery, when it is noted in the CMP on several occasions that (eg: in the assessment of 58-60 Oxford Street) that *“it is not known to what extent earlier fabric is beneath these finishes... further investigation required to ascertain amount and condition of remnant original / early fabric beneath.”* These buildings may contain more significant fabric than is currently visible – and this may be demolished before it is understood.

The National Trust consider that the scope of demolition proposed in this application, while the original application is yet to be approved, is not justifiable in heritage terms. Any demolition work to such a large suite of historic buildings must be considered in the context of a complete design proposal – not simply be expedited as preliminary works.

We would encourage a more considered approach to this important collection of heritage-listed buildings on one of Sydney’s most important streets.

Kind regards,

David Burdon
Conservation Director