

Matthew Girvan  
Planning Officer  
City of Sydney  
Sydney NSW 2001

By Email: [dasubmissions@cityofsydney.nsw.gov.au](mailto:dasubmissions@cityofsydney.nsw.gov.au)

29 March 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 and January 2022 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 National Trust remain greatly concerned that the extensive demolition work proposed in this latest application is being undertaken without the final scheme (as per the original DA) actually being approved. There is a very great risk that extensive and irreparable damage will occur.**

This concern was highlighted earlier by the Trust when we commented on the early works package, and we still have the same reservations with this current approach. The current description of what is in fact a *demolition plan* instead being referred to as a "Restoration Plan" in the architectural drawing package is one reason for this scepticism.

Once again, the National Trust of course has no objection to aspects of this or the earlier applications for certain works that can be supported in heritage terms (such as the removal of 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.



The scope of demolition work has certainly been reduced in certain areas, as can be seen in the comparative selection of drawings from the various applications. All of the below schemes have been justified at each stage in heritage terms as being necessary for the new works to be carried out, yet each time the extent of demolition is (fortunately) reduced. This is why it is necessary to consider extensive demolition works as part of an overall application.



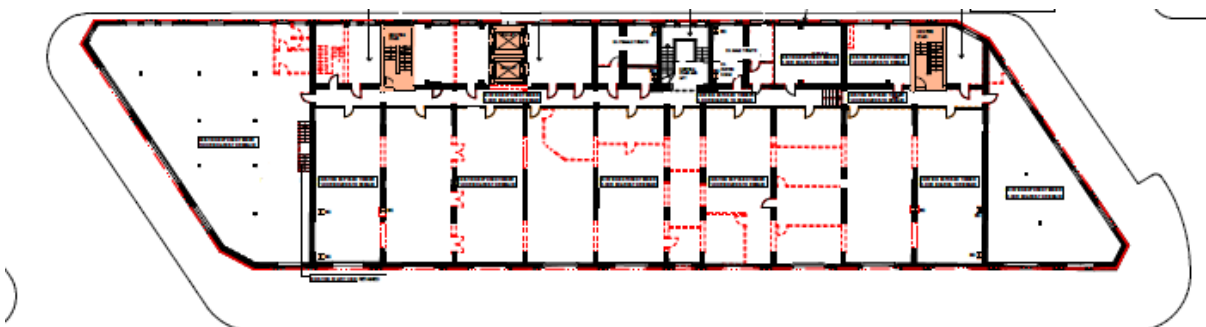
Earlier Group 2 First Floor Heritage Significance grading diagram (Source: Urbis CMP)



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



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



Current Group 2 First Floor "Restoration Plan" (Source: Place Studio Drawing AR-DA-2-1002)



The DA drawings show a mixture of “interpreted”, “conserved”, “new” and “reinstated” shopfronts, but it is not clear what exactly the difference is between these descriptions. The Trust recommend that scheduled works for shopfront condition details must be accompanied by accurate drawings outlining the works to ensure that this advice is actually followed, and contractors are not simply left to retain or conserve details in line with instructions such as *“Shopfront to be consistent with evidence in the 1937-1940 shopfront drawings (City of Sydney Archives CRS 782 1573/1-3) and historic photographs between 1937 and 1960.”*



Current Group 2 Elevations (Source: Place Studio Drawing AR-DA-2-5000)

In our earlier submissions we noted that significant investigation works needed to occur to inform the design. It is pleasing that this advice is now being heeded and the Trust would support the note in the architectural package that *“should any original components be uncovered, they must be retained and conserved, and the design of the shopfront modified to suit.”* We would however maintain that is a better approach to do this investigative work now, and not as part of a demolition project when designs will need to be modified on the run.

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. We stand by our earlier comments on the overall proposal for additional floors above and the negative impact this will have on the streetscape.

The Heritage Impact Statement for this application states that it *“has been prepared in the context of proposed works to the buildings which will facilitate their ongoing use and conservation as functioning commercial buildings set within an historic streetscape.”* This is not simply a renovation project of the existing buildings however, as a large component of the works proposed is in fact to facilitate other development of the site. As the HIS goes on to state: *“The proposed removal of select sections of masonry walls throughout the buildings is in keeping with the requirements of the draft conditions of consent for the original development application.”*

**The National Trust maintain that 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 before the proposed works which make this necessary are even approved.**

Kind regards,

David Burdon  
Conservation Director