

THE PADDINGTON SOCIETY INC.

FOR COMMUNITY AND HERITAGE

City of Sydney 456 Kent Street Sydney NSW 2000

Sent via email to: **sydneyyoursay@cityofsydney.nsw.gov.au** Attention: Joe Burraston, Senior Specialist Planner

19 September 2025

Dear Mr Burraston,

Victoria Barracks, Paddington

On behalf of The Paddington Society (TPS) we are responding to the City of Sydney (CoS)'s invitation for feedback on a future vision for the Victoria Barracks site, the most significant military site in Australia, should it ever be divested by the Australian Defence Force (ADF).

Heritage listing & protections: The site was listed on the Commonwealth Heritage List in 2004. It is protected under the Environmental and Biodiversity Conservation (EBPC) Act and listed on the Commonwealth Heritage List and the Register of the National Estate. The Commonwealth listings provide very important protections for its heritage values, but allow appropriate Defence site use and development.

 The Paddington Society believes that the best heritage outcome for the site would be to retain ADF ownership and ongoing usage, with the option of allowing more community access to its green spaces, museum etc, without compromise to defence activities and security on the site.

Background: In 2023 the Federal government undertook an audit of ADF land, including Victoria Barracks in Paddington. The audit assessed whether the ADF sites still met military needs. Divestment appears to be on hold, and the recommendations of the audit have not been made public.

Whether the ADF will require ongoing ownership of and presence on the Victoria Barracks site will dictate whether portion(s) of the site may be declared surplus to requirements or divestment.

Should the site in whole or part ever be declared surplus, it will necessitate rezoning before it could be used for any purpose other than those permitted under the existing, Heritage protections and very restricted, SP1 Defence zoning. Rezonings in NSW are generally undertaken by the Department of Planning Housing & Infrastructure (DPH&I), in consultation with various other parties, which in this case would include the ADF, appropriate Federal Government departments and the City of Sydney.

The rezoning process would be likely to take many months, or more likely years, to complete, as it would involve many elements of site investigation and community consultation, before the most appropriate uses and development controls could be finalised. Examples of such investigations and controls include but are not limited to: heritage, geotechnical, contamination, audit of existing structures, investigation of adequacy of services and other infrastructure, parking and traffic generation, height limits, permitted uses (including community access) and the provision of open space.

Only after rezoning is finalised, could the site (or portions thereof) be offered for sale by ADF to the open market. Once sold, development applications would need to be prepared by the new owner(s) and assessed (including extensive public consultation) prior to approval by the appropriate consent authorities, with application of stringent conditions.

The above outline identifies our understanding of the extensive complexity, time-consuming and costly work and consultation required before any redevelopment on the site could commence, assuming that any part of the site is ever declared surplus to ADF requirements.

Victoria Barracks is significant on many levels; it is a unique living part of the heritage of our city and nation. We support retention in its current form, including ADF usage. It is/has and includes:

- high heritage significance, the whole site, including buildings, landscape, gardens and perimeter walls
- large numbers of significant green open spaces and superb buildings, all reflecting its military history
- the site has been a military place for 185 years in a city that is only 230 years old
- strategically located on a prominent ridge, it was the catalyst for the development of Paddington
- the low scale buildings relate harmoniously and match those of Paddington to north, east and west
- it maintains strong townscape connections with surrounding colonial-era and Victorian precincts
- large numbers of significant buildings from colonial & Federation periods are immaculately conserved
- historic large open spaces, landscapes host to diverse native species, gardens, symbolic plantings, memorials and structures, including Busby's Bore, are strategically located throughout the whole site
- the site has only very small areas of land that could be used for appropriately low scaled development

Future community vision and comments:

- Any new construction must be limited to only those small areas of suitable land and must be prepared
 to a masterplan that respects all existing historic structures, landscapes and the scale of the Barracks,
 including its context and relationship with the low scale of historically significant civic structures and
 surrounding Paddington Heritage Conservation Area precincts.
- Victoria Barracks bears no relationship to the heritage significance, location, scale, setting, context etc of the Paris example, added to and inserted into that entirely different urban context by Paris Habitat, said to be the largest public housing authority in Europe, with some 123,000 managed dwellings.
- Any housing provision on the Victoria Barracks site should therefore be limited to 3 storeys, precluding the 6-8 storeys possible under current LMR definitions by the NSW government. It is highly unlikely that genuinely affordable housing could be provided, given the heritage and other site constraints.
- If the site or any part of it is ever considered appropriate for divestment and/or increased appropriate community access to open spaces, divested or underutilised buildings, the Society could support this, provided that management continues by relevant authorities in association with the ADF.
- Site sale proceeds should be provided by the ADF to fund ongoing maintenance of historic buildings and associated costs. Shortfall in funding is likely to need to be provided by the Federal and/or NSW or local governments, together with new owners of the site, with all the appropriate financial and other safeguards to ensure long-term sustainability of the maintenance of the historic buildings and grounds. City of Sydney may be in a position to provide funding and /or services in this regard.
- The Paddington Society reaffirms the belief that the best heritage outcome for the site is
 to retain ADF ownership and ongoing usage, with the option of investigating allowing more
 community access to open areas and adaptively re-used buildings, without compromise to
 Defence activities and security on the site

Yours sincerely,

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Esther Hayter President - The Paddington Society - Tel: 0411 109 770