

16 March 2026

State Significant Development Application SSD-97528708 160 Oxford Street, Paddington

I submit this objection to the proposed State Significant Development at 160 Oxford Street, Paddington in my capacity as a local government councillor, representing the Paddington Ward of Woollahra Municipal Council since 2012. I understand deeply the attitude of my local community to the careful conservation of Paddington's unique built heritage. I have been approached by literally hundreds of residents from December until now, gravely concerned about the impact of the proposal if approved.

This SSD application raises issues that extend far beyond the redevelopment of a single site. The proposal directly tests the integrity of the planning framework that has protected the Paddington Heritage Conservation Area for more than half a century. The Department's decision will establish an important precedent for how heritage conservation areas across New South Wales are treated when confronted with large-scale redevelopment proposals justified by recent state-level planning reforms.

Paddington is widely recognised as the most intact Victorian terrace precinct in Australia, if not the world. The suburb's heritage significance derives not only from individual buildings but from the collective urban form — the fine-grain subdivision pattern, the consistent two- and three-storey scale, the rhythm of terrace streetscapes and the visual continuity that has been preserved across the precinct. Terrace typologies illustrate the historical development of Paddington. The area in which the subject sits is known as 'Little Paddington'; a highly prized example of small-scale workers cottages, built to house the workers who built Victoria Barracks.

Decades of community effort has been successful in preserving Paddington as we know it today. It's why the Paddington Heritage Conservation Area was established, and the suburb remains one of Sydney's most valued historic environments – low rise, human-scale and walkable. If approved in its current form, this proposal risks opening the floodgates, compromising the integrity of fine grain controls respected by developers over decades, as well as the very protection traditionally understood to be afforded by a Heritage Conservation Area.

1. Inconsistency with established heritage planning controls

The site sits within, or directly adjacent to, the Paddington Heritage Conservation Area under the Woollahra Local Environmental Plan 2014.

The LEP establishes clear objectives for heritage conservation areas, including:

- conserving the heritage significance of the area as a whole
- retaining the historic scale, subdivision pattern, and streetscape character
- ensuring new development is compatible with the existing built form

The proposed development, an eight-storey building with four basement levels and approximately forty apartments, represents a scale of built form that is fundamentally inconsistent with the established character of the conservation area.

Paddington's streetscape is overwhelmingly defined by two- and three-storey Victorian terraces. In this precinct, Little Paddington, the streetscape is predominantly one storey cottages. These buildings create the distinctive human-scale urban grain that gives the precinct its heritage value.

Introducing an eight-storey structure within this context risks overwhelming that historic scale and permanently altering the visual hierarchy of the streetscape. It is not possible to provide an appropriate or aesthetically suitable transition between a eight storey structure and a one and two storey streetscape.

Heritage conservation areas are not intended to accommodate development that dramatically exceeds the established urban form. Their purpose is precisely the opposite: to ensure that change occurs in a way that respects and reinforces the historic character of the precinct.

2. Height and density variations contrary to planning principles

The proposal relies heavily on the additional height and density incentives available under the Housing SEPP (Affordable Housing provisions).

While the objective of increasing affordable housing supply is supported, the use of these provisions in this instance raises serious concerns.

The scale of the bonus sought appears disproportionate to the affordable housing outcome delivered. The proposal seeks substantial additional height and density while delivering approximately ten affordable dwellings within a development of roughly forty apartments.

This must also be considered in the context of the existing 27 studio apartments on the site, which have historically accommodated lower-income residents including students and essential workers.

There is a legitimate concern that the redevelopment may result in a net reduction in genuinely affordable housing, despite relying on affordable housing incentives to justify its scale.

Affordable housing provisions should not become a mechanism through which developments of fundamentally inappropriate scale are introduced into heritage precincts.

Concerns about the inequity in affordable housing in the proposal and the loss of the 27 genuinely affordable units existing, have been some of the most common and loudest concerns raised with me in my capacity as a local councillor.

3. State Significant Development pathway undermining local planning oversight

It is particularly concerning that this project is being assessed under the **State Significant Development (SSD) pathway**.

The SSD process is typically reserved for projects of genuine strategic importance to the state. Its application in this case has the effect of removing primary decision-making authority from the local council, which has historically been responsible for managing the Paddington Heritage Conservation Area.

Local governments play a critical role in protecting heritage precincts because they possess the local knowledge and planning frameworks necessary to assess impacts on historic streetscapes.

The use of the SSD pathway in this case risks undermining the planning framework that has protected Paddington's heritage for decades.

4. Public interest

Under the Environmental Planning and Assessment Act, the Department must consider whether a proposal is in the **public interest**.

In this case, the public interest must be assessed against several competing considerations.

Protection of irreplaceable heritage

Paddington represents one of the most intact Victorian terrace suburbs remaining in Australia. Its preservation has been the result of decades of careful planning and community stewardship.

Heritage conservation areas represent a finite and irreplaceable resource. Once their character is compromised, it cannot be restored.

This proposal risks irreversible impacts on Little Paddington, a prized precinct of workers cottages.

The public interest strongly favours protecting such environments and the built heritage of Paddington.

Housing supply and affordability

While increasing housing supply is an important policy objective, this goal must be pursued in locations where additional density can be accommodated without undermining historically significant urban fabric.

Inner-city Sydney contains numerous locations better suited to large-scale redevelopment, including transport corridors, commercial centres and brownfield sites.

The public interest does not support introducing high-rise development into heritage precincts where it risks destroying the very qualities that make those places significant.

Planning certainty and policy integrity

The public interest also requires a planning system that provides certainty.

Residents, investors and communities rely on planning controls — including heritage conservation areas — to provide clear expectations about the future character of neighbourhoods.

Many ‘mum and dad’ developers have gone to great lengths required under the Paddington Chapter of the Woollahra DCP which not only limits permissible development but requires careful and often expensive restoration elements. It seems an injustice that despite so many low level developments have made efforts to comply, the state government will allow large scale developers to overrun the controls completely and deliver an oversized compromise to the integrity of the wider Heritage Conservation Area.

If developments that significantly exceed those controls are approved through state-level pathways, confidence in the planning system is inevitably further weakened.

5. Precedent and cumulative impacts

The decision on this application will establish an important precedent.

If an eight-storey building can be approved within or adjacent to the Paddington Heritage Conservation Area, it will become increasingly difficult to resist similar proposals elsewhere in the suburb.

Heritage areas are rarely destroyed by a single development. Instead, they are gradually eroded through incremental approvals that progressively alter scale and built form.

Paddington has avoided this outcome precisely because governments have historically applied strong and consistent heritage protections.

Approval of this proposal would represent a departure from that approach. It will signify the subordination of the Heritage Conservation Area to the SEPP in a way that is new and will set a precedent for application across NSW, diminishing the protections traditionally guaranteed by an HCA.

6. Cultural and national significance of Paddington

Paddington’s heritage value extends beyond the local government area.

The suburb is widely recognised as one of Australia’s most distinctive and well-preserved Victorian neighbourhoods. Its terrace streetscapes are a defining element of Sydney’s cultural landscape and are recognised nationally and internationally as a rare surviving example of nineteenth-century urban form.

The preservation of this character has delivered enormous cultural and economic value to the city.

The erosion of this historic fabric would represent a significant loss to the heritage of New South Wales.

Conclusion

The Department's decision on this proposal will have consequences far beyond the redevelopment of a single site.

If approved, the project risks signalling that even the most historically significant and carefully protected conservation areas in New South Wales are no longer secure from large-scale redevelopment facilitated by planning incentives and state-level approval pathways.

Paddington has remained one of the most intact Victorian suburbs in the world because successive governments, councils and communities have recognised the importance of protecting its heritage character.

This application represents a critical test of whether that commitment remains. This point is well understood in my community and has many residents significantly concerned about the negative impacts of the proposal on Paddington's built form as well as immediate adjoining neighbours to the subject site.

I endorse the submissions of The Paddington Society and Paddington United group. I feel compelled to underscore the level of concern this proposal has generated across Paddington.

Approval of this proposal would mark a turning point — the moment when the integrity of the Paddington Heritage Conservation Area was first materially compromised.

For these reasons, I strongly urge the Department to refuse the application or require a substantially redesigned proposal that genuinely respects the scale, character and heritage significance of the Paddington Heritage Conservation Area.

Yours sincerely,

Cr Matthew Robertson

Paddington Ward Councillor

Woollahra Council