THE PADDINGTON SOCIETY INC
FOR COMMUNITY AND HERITAGE
EST 1964

For the attention of the Hon. Paul Scully MP
Minister for Planning and Public Spaces
Email: office@scully.minister.nsw.gov.au and osec.corro@dpie.nsw.gov.au

21 October 2026

For attention: Ms Kiersten Fishburn, Secretary, NSW Department of Planning, Housing & Infrastructure

Dear Minister and Ms Fishburn,

Oxford and Verona Street, Paddington SSD-87245208
13-17 Oxford Street and 2 Verona Street, Paddington: Mod 1 Design Amendments to Approved DA

The Society supports certain aspects of this Modification.
We support the increase in Affordable Housing unit numbers (see proviso below), the implied inclusion of four cinemas (this needs to be confirmed and/or conditioned) and the relocation of these cinemas to B1 and B2 from the previous B3; the change of brick colour BR2; and the increased setback of basement levels from site boundaries The cinemas are much desired community resources, greatly valued, patronised, and previously provided on this site.

However, we still believe that the apartment façade design is over scaled relative to that of its neighbour, the 25 hours Hotel at 1-11 Oxford Street.

Concerns and objections are as follows.

1. **The 7-8 storeys approved is already too high in the Heritage Conservation area and in the streetscape of Oxford Street.**

The proposal is in a sensitive location in Oxford St and is already higher than its context.

Increasing the height to c 6m over the LEP + affordable housing bonus height of 26m is not trivial, has not been properly justified, and will only exacerbate streetscape issues. The Paddington Society believes that State Significant DAs which take advantage of the new generous height and FSR bonuses (here Cultural and Creative, plus Affordable Housing) **should NOT be allowed the extra luxury of Section 4.55 of the EPA Act, or Section 4.6 of the Standard Instrument, request for even more height and FSR.** We believe this to further erode community faith in the planning process and to be a bad precedent for all such DAs.

The streetscape impact is indicated in Visual Analysis Viewpoint 02 from Oxford St which shows the bulky and service-messy interface with the 25 Hour Hotel. Note, also, the West Elevation which also shows this messy interface. The applicant should provide a to-scale north-south cross-section through the proposal and the north side of Oxford St to prove that the proposal's extra floor and higher lift over-run will not be visible from the north side of Oxford St. above the approved façade height.

The Society recommends that, if allowed, the new Level 7 be set further back to 'hide' it from street view, and that the lift type be reviewed – retain the platform lift solution to reduce bulk.

We also recommend that the additional floor space proposed at the NW corner (next to the Hotel) on Levels 4, 5 and 6 be **not** approved, in order to reduce the bulk at this interface and to be remain as a transition piece to the Hotel, ie to remain as for the approved proposal (see p 19 Modification Report).

The revised brick colours are supported but only if elevations are coded for materials, as part of the Application, while a brick manufacturer should be cited.

2. **The increase in car parking provision** from that set out in the Approved DA **is *not* supported**, with the proposal increasing from 56 spaces to 80 spaces, although only 4 units have been added (now a total of 68 units).

   Maximum parking rates (66 residential and visitor spaces for this modification), as set out in SLEP 2012 Clause 7.5, should be applied to this very accessible site, to reduce the traffic impact on surrounding streets, the water table, and on neighbouring structures. 3 cars per unit, even for penthouses, is excessive in this location. Compliance would lead to less excavation, and thus less environmental impact.

   The Standard Instrument definition of Gross Floor Area means that that any extra over maximum car parking contributes to GFA and should apply here.

3. **The number of Affordable dwelling units on the site will still be *decreased* in this modification, even with the additional 4 units proposed.**

   Currently there are 27 one-bed units, renting at c $700 per week, whereas the modified proposal will provide 18 Affordable units, to be rented only for 15 years at 20% lower than the median rental for the suburb, which is highly likely to be considerably higher than the current rental.

   Since the proposal depends on the provision of Affordable units in order to gain an additional two upper floors, which will have access to valued and highly profitable harbour views, we ask that the modified proposal provides a minimum of 23 Affordable units, i.e. 15% less than currently, in line with the City of Sydney LEP 2012 Amendment no. 109 re Dwelling Retention.

   The modified proposal shows 12 of the Affordable units located on Level 1, occupying the whole floor. The distribution should be changed for these units over a few floors, to avoid the discrimination of a 'poor floor'.

   Moreover, the Paddington Society's position is that the Affordable Housing bonus should only apply if these units are rented out at 30% of resident income, and for perpetuity – a permanent and viable public good which would come closer to justifying the development increase.

4. **Impacts on Rose Terrace:**

   The ADG recommends 18m separation between habitable rooms, yet the modified proposal still has balconies and bedroom windows 11-12m away from habitable room windows of the tiny Rose Terrace dwellings. The modified proposal should include privacy screens to balconies to units at all levels, with the possible exception of balconies on Levels 5, 6 and 7 if sightlines permit.

   The Society recommends that 16, 18 and 20 Rose Terrace be renovated but remain subdivided and be reserved for 3 units of Affordable Housing. This would be a better heritage and social outcome for these Heritage Items – subdivision patterns are a crucial part of their heritage significance.

We trust that the Minister and DPHI Assessment team will take our concerns into consideration,

Yours faithfully



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