

Petra Balanzategui
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Heritage 21
Suite 48/ 20–28 Maddox Street
Alexandria NSW 2015

RE: REQUEST FOR INFORMATION – HERITAGE ASSESSMENT OF 24–28 MIDDLE HARBOUR ROAD, LINDFIELD, NEW SOUTH WALES

Dear Petra,

Austral Archaeology Pty Ltd (Austral) has been commissioned by Heritage 21 (the client) to respond to a Request for Information (RFI) issued for the 24–28 Middle Harbour Road, Lindfield, New South Wales (NSW) [the study area] project proposal. MHR Lindfield Investments Pty Ltd ATF MHR Lindfield Trust (the proponent) has received feedback from various government agencies as part of the Environmental Impact Statement (EIS) for the State Significant Development (SSD) [SSD-82548708]. The responses are identified in the letter below, and references are provided to show where they are addressed in the Preliminary Historical Heritage Assessment (PHHA), dated 6 May 2025 (Austral Archaeology Pty Ltd 2025).

This letter seeks to clarify the location of required information in the PHHA and further justify its findings where the RFI has identified ambiguity. Feedback on the PHHA was returned as part of the public exhibition of the proposal; no agency responses were received in relation to the archaeological findings.

VIEWSHEDS BETWEEN HERITAGE SITES AND THE STUDY AREA

The Historical Heritage Assessment is misleading and deceptive. The Report doesn't include photos of the adjoining heritage items (to or from). The commentary on visibility and vegetation is false.

Heritage items outside the study area were not photographed; however, views between these sites and the study area are included in the report. It is understood that the 3 identified properties are occupied, were surrounded by dense vegetation, and given that these are outside the study area and no direct impacts to the structures are proposed, there was no need (or requirement) to request access to these properties to photograph the individual items. However, the broader heritage context is provided in the PHHA as Figure 4 (2025:20), with the relevant properties listed in Section 6 of that document (2025:14).

All statements regarding visibility and vegetation made in the PHHA (2025:8) are evidenced by photo records provided at the rear of the document:

- Viewsheds between the study area and the site 'Laurabada' (*Ku-ring-gai Local Environmental Plan 2015* [Ku-ring-gai LEP] I42) are provided as Figures 12 and 13 (Austral Archaeology Pty Ltd 2025:27).
- While not the focus of the photo, viewsheds to heritage item 'Dwelling House' (Ku-ring-gai LEP I43) are shown in Figure 19 (2025:30); additionally, the vegetation referenced in the commentary on page 8 is shown on the aerial image provided as Figure 2 (Austral Archaeology Pty Ltd 2025:18)
 - Further evidence of this claim is provided in Figure 1 and Figure 2 below.



Figure 1 South-east facing view from front yard of 28 Middle Harbour Road towards street.

*2 metre scale. 30 Middle Harbour Road property visible in foreground to left.
Note: indicative vegetation between study area and heritage-listed dwelling.*



Figure 2 South-east facing view of streetscape towards 'Dwelling House' (I43).

*Source: Google Street View 2020, taken from edge of 28 Middle Harbour Road.
'Dwelling House' (I43) property frontage shown in red.*

- Due to the proximity of the site 'Dwelling House' (Ku-ring-gai LEP I49) to the study area, the PHHA provides commentary on sightlines from each property in the study area (Austral Archaeology Pty Ltd 2025:9–10). These statements are evidenced in photos at the rear of the report.
 - Viewsheds from 24 Middle Harbour Road are shown as Figure 35 (2025:38), and are further contextualised by Figure 33 (2025:37).
 - Viewsheds from 26 Middle Harbour Road are provided as Figure 30 (2025:36), with context provided in Figure 25 (2025:33).
 - The sight line between 28 Middle Harbour Road and Ku-gai-LEP site I49 is provided as Figure 22 (2025:32).

The document also provides additional commentary on how the height of the proposal will likely create additional sightlines; however, the majority of the obscuring vegetation is beyond the property boundary. Therefore, the proposal is likely to be similarly impacted (Austral Archaeology Pty Ltd 2025:9).

OUTCOMES OF VEGETATION CLEARANCE

The loss of mature vegetation will further erode the landscape character of the conservation area and the setting of heritage items.

The significance of mature vegetation on the character of the 'Trafalgar Avenue Conservation Area' (Ku-ring-gai LEP C31) is referenced in the assessment (Austral Archaeology Pty Ltd 2025:12). This is then addressed in the heritage impact section below (2025:14):

As there is proposed development within the Trafalgar Avenue Conservation Area (C31), this presents capacity for greater potential impacts to heritage values. However, the Ku-ring-gai [Development Control Plan] 2022 provides controls for development within heritage conservation areas. As such, so long as the works are compliant with the [Development Control Plan], the proposed development is acceptable from a heritage standpoint.

CONCLUSION

Based on the above, Austral asserts that the requested information is accurate and readily available in the document.

Please do not hesitate to contact me for further information at the contact details provided below.

Yours sincerely,



Jake Allen

Archaeologist

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REFERENCES

Austral Archaeology Pty Ltd 2025, 'Preliminary Historical Heritage Assessment of 24-28 Middle Harbour Road, Lindfield, New South Wales'. Preliminary Historical Heritage Assessment.