

8 April 2026

Amy Watson  
Director, Affordable Housing Assessments  
DPHI



Dear Sir/Madam

## **STATEMENT OF HERITAGE IMPACT PROPOSED REDEVELOPMENT 19-25 BALFOUR STREET, LINDFIELD**

This Statement of Heritage Impact has been prepared to accompany a SSDA for the proposed redevelopment of 19-25 Balfour Street, Lindfield.

The report evaluates the proposed development, designed by Giles Tribe.

It provides information, analysis and recommendations to enable the Department to evaluate the project in terms of Clause 5.10(4) of the *Ku-ring-gai Local Environmental Plan (LEP) 2015*. It concludes that the subject existing houses are non-contributory items in the HCA and the development is generally in keeping with the provisions of the LEP and the Apartment Design Guide (ADG).

An assessment of the contribution that the subject houses make to the Balfour Street / Highfield Road Conservation Area is provided as an appendix to this report.

### **INTRODUCTION**

The subject site is a saved TOD (Transport Oriented Design) site under the previous TOD provisions, which allows for a maximum height for the subject properties at 28.6 metres.

This SSDA seeks development consent for a proposed residential flat building, including in-fill affordable housing at 19 – 25 Balfour Street, Lindfield. The proposed works include demolition of existing structures, site preparation works, excavation and construction of the building and associated landscaping works.

Specifically, the SSDA seeks development consent for:

- demolition of existing buildings and structures on site.
- construction of a ten-storey residential flat building, with basement car parking.
- associated landscaping works, including a communal open space.
- associated infrastructure and services.

GBA Heritage  
Heritage Consultants

Level 4, 63 York Street  
Sydney NSW 2000  
Australia  
T: +61 2 9299 8600  
F: +61 2 9299 8711

[gba@gbaheritage.com](mailto:gba@gbaheritage.com)  
[www.gbaheritage.com](http://www.gbaheritage.com)

Nominated Architect  
Graham Leslie Brooks  
NSW Architects  
Registration 3836

GBA Heritage Pty Ltd  
Incorporated in NSW

ABN 56 073 802 730  
ACN 073 802 730

The proposal incorporates 17% affordable housing pursuant to Chapter 2, Section 15C and Chapter 5, Section 156 of the Housing SEPP. The proposal seeks to utilise the incentive controls under Chapter 2, Part 2, Division 1, Section 16 of the *State Environmental Planning Policy (Housing) 2021 (Housing SEPP)* to achieve 30% additional building height and floor space ratio (FSR).

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) dated 22 April 2025 (SSD-82709458). Specifically, this report has been prepared to respond to the SEARs requirement issued below.

| Item                       | Description of Requirement                                                                                                                                                                                            |
|----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 22. Environmental Heritage | Where there is potential for direct or indirect impacts on environmental heritage, provide a Statement of Heritage Impact and Archaeological Assessment (where required), in accordance with the relevant guidelines. |

**SUBJECT SITE**

The site is located at 19-25 Balfour Street, Lindfield, within the Ku-ring-gai Local Government Area (LGA). It is legally described as Lot 12 DP654363, Lot 1 DP121527, Lot 13 DP657173, and Lot 13 DP663524.

The site has an area of approximately 4,771m2 and is generally rectangular in shape.

The site is currently occupied by four detached dwellings, swimming pools, landscaping and ancillary structures.

A State Environmental Planning Policy Amendment (Ku-ring-gai Station Precincts) 2025 was published on the NSW Legislation website and came into effect on 14 November 2025. Ku-ring-gai Council rezoned the subject site to R4 - High Density Residential.

The site itself is not identified as a heritage item; however, it is located within Balfour Street/Highfield Road Conservation area (Area C29). Schedule 5 of the *KLEP 2015* states the heritage area is valued for its aesthetic and historical significance with the Federation Queen Anne style housing. Within the heritage area there is one heritage item located approximately 30m from the site (I39).

High biodiversity value land is present at the site across the north part of the site, pursuant to the *Biodiversity Conservation Act 2016*.

**SURROUNDING CONTEXT**

To the north of the site is the broader Balfour Street Highfield Road Heritage Conservation Area, of which the subject site occupies the south-western portion of the area. Further north is an area of low density residential, consisting generally of one to two storey dwellings.

Pacific Highway and Lindfield Station are located approximately 330m east of the site, with a strip of commercial and retail uses along the highway. To both the south and west is a large area of low-density residential homes. Beyond this is a golf course and local park both within a kilometre west of the site.

In addition to Lindfield Station, the site is also serviced by several bus services, with the nearest stop approximately 400m away (6 min walk), offering services to Chatswood and Macquarie University. The site is located approximately 2.75km north-west of Chatswood, 4.4km east of Macquarie University, and 10.5km north-west of the Sydney CBD.

## HERITAGE MANAGEMENT FRAMEWORK

The subject properties at 19-25 Balfour Street, Lindfield are **not** listed as heritage items in any statutory instrument. They are, however, currently located within the boundaries of the Balfour Street / Highfield Road Conservation Area, pursuant to the *Ku-ring-gai Local Environmental Plan (KLEP) 2015*. They are also within the vicinity of 28 Bent Street (I416) and 6 Highfield Road (I39), which are listed as items of Local heritage significance in schedule 5 of the *KLEP 2015*.



**Figure 1**  
Site Context  
Source: Nearmap

## ESTABLISHED SIGNIFICANCE OF THE HERITAGE ITEM IN THE VICINITY OF THE SUBJECT SITE

Two heritage items are located in the vicinity of the subject site. These items are listed as items of local heritage significance on Schedule 5 of the *KLEP 2015*.

The NSW Heritage Inventory contains the following Statement of Significance for heritage item ID 1882457, 28 Bent Street, Lindfield, *Dwelling house* (I416):

*The property is significant as part of the early residential development of the suburb of Lindfield and as part of the early development of “JH Park’s Subdivision, Lindfield”. Although having undergone some modifications to the original building, the house remains largely intact externally with its original inter-war bungalow stylistic detailing. The deep setback and mature palm trees at the front of the house contribute to the streetscape character as the original curtilage to this early twentieth century residence.*

*The item is of local heritage significance in terms of its historical, aesthetic and representative value. This satisfies three of the Heritage Council criteria of local heritage significance for local listing.*



28 Bent Street is located across Bent Street from the subject properties and is over 40 metres to the south. The heritage item is well removed from the subject properties and makes little contribution to their setting.

The NSW Heritage Inventory contains the following Statement of Significance for heritage item ID 1880578, 6 Highfield Road, Lindfield, *Dwelling house* (I39):

*The property has local historical significance as a fine Federation Queen Anne dwelling constructed c.1903, during an early phase of development in Lindfield and Ku-ring-gai more broadly, following the opening of the railway station on the North Shore line in 1890.*

*The building is of local aesthetic significance as a good and largely intact example of a Federation period dwelling with Queen Anne features. Despite some modifications, the dwelling retains a strong sense of its early form, character and details including the face stone base, brick facades, main gabled and hipped roof form and terracotta roof cladding, rendered brick chimneys, open front balcony and associated details and original timber framed windows and doors.*

*The dwelling also retains its early (1903) boundaries, fine brick front fence and a front and side garden setting with garden trees and plantings which overall makes a positive visual contribution to the Highfield Road streetscape. The building setting is also enhanced by a landscaped garden area and swimming pool on the western side, garden and plantings to the southeast and an open tennis court at the rear (south) of the building.*

*The item is of local heritage significance in terms of its historical and aesthetic value. This satisfies two of the Heritage Council criteria of local heritage significance for local listing.*

6 Highfield Road is separated from the subject properties by intervening houses and currently has little to no impact on the setting of the subject houses.



**Figure 4**  
The front facade of 28 Bent Street, Lindfield (I416)  
Source: NSW Heritage Inventory



**Figure 5**  
Street map showing the subject properties outlined in red and the heritage items in the vicinity outlined in blue. The subject properties are across Balfour Street and Bent Street from the heritage item  
Source: SDT Explorer



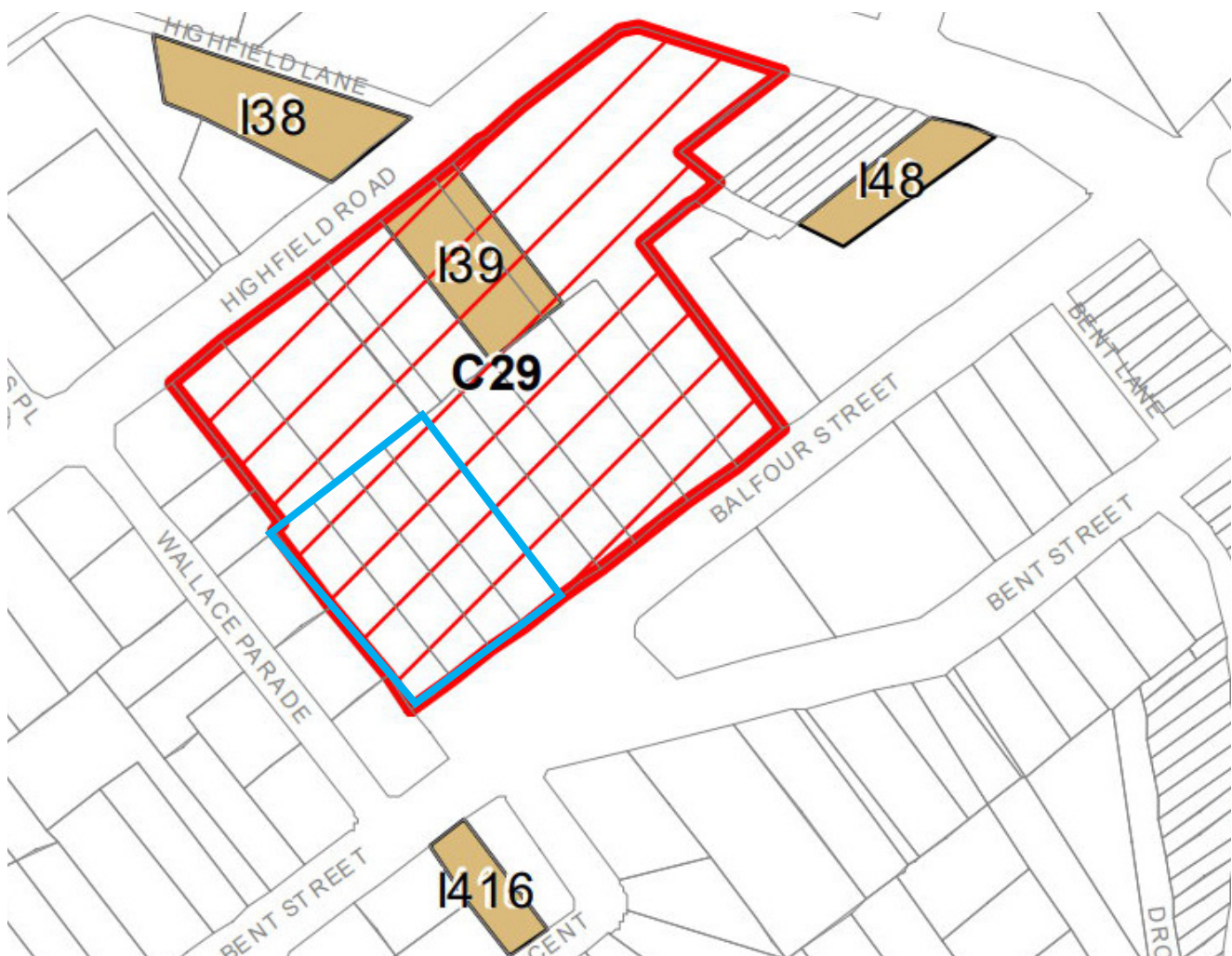
The Balfour Street / Highfield Road Conservation Area (C29) is listed as an HCA of local heritage significance in the KLEP 2015. Ku-ring-gai Council's website contains the following statement of significance for the Balfour Street / Highfield Road Conservation Area:

*Historically, the area represents the residential development of Lindfield in the early twentieth century following the opening of the North Shore rail line. The area demonstrates the subdivision of large land grants from the early nineteenth century, driven by the increased population of the area resulting from the improved access brought about by the railway.*

*Aesthetically, the area contains an important collection of intact Federation Queen Anne style housing, located on the northern side of Balfour Street. The area also includes the Holy Family Catholic Church constructed in 1940, and the school at 2-4 Highfield Road (corner Pacific Highway). The school includes 7 Balfour Street, one of the intact groups of Balfour Street Federation Queen Anne style houses. The area contains the presbytery associated with the Holy Family Church at 10 Highfield Road.*

*The area is of local heritage significance in terms of its historical, aesthetic and representative value. This satisfies three of the Heritage Council criteria of local heritage significance for local listing.*

The Federation Queen Anne house at 7 Balfour Street was redeveloped in 2010.



**Figure 6**  
Ku-ring-gai Heritage Map 015. The subject site is outlined in blue  
Source: Ku-ring-gai LEP 2015

## DEVELOPMENT IN THE BALFOUR / HIGHFIELD ROAD CONSERVATION AREA AND VICINITY

The Federation Queen Anne house at 7 Balfour Street was redeveloped in 2010.

A State Significant Development Application (SSD-85974227) has been lodged for the adjacent site at 9-17 Balfour Street, Lindfield, for the redevelopment of the property and the construction of a 10-storey residential apartment building.

The 9-17 Balfour street proposal is for the demolition of four detached dwellings within the Balfour / Highfield Road Conservation Area, and construction of an apartment building with a three storey podium. The proposed building will have a setback at the podium level of 6m from the subject site, and a 9m setback from the tower above.

DPHI recently approved a residential flat building development of up to 10-storeys with affordable housing at 9-21 Beaconsfield Parade, Lindfield (SSD-81623209). This development, which is within the general vicinity of the subject site, included the redevelopment of a number of houses within the Frances Street Conservation Area (C30). While Part 19 of the Ku-ring-gai DCP 2025 addresses heritage items and conservation areas, development control plans are not applicable to State Significant Development pursuant to Clause 2.10(1)(a) of the Planning Systems SEPP. Accordingly, the Ku-ring-gai DCP is not applicable.

### APARTMENT DESIGN GUIDE

Within Chapter 5 of the *SEPP (Housing) 2021*, Section 161 *Consideration of Apartment Design Guide* states the following:

*Development consent must not be granted for development for the purposes of residential flat buildings or shop top housing on land in a Transport Oriented Development Area unless the consent authority has considered the Apartment Design Guide.*

The Apartment Design Guide (2015), includes the following relevant findings:

- Proposals for apartment buildings should consider heritage items within a radius of 400 metres to 1 kilometre.
- Building height controls should be informed by “heritage”. It may be appropriate to determine heights by relating them to site-specific features such as heritage items.
- The allowable floor space ratio (FSR) may relate to “heritage considerations”.

### THE DEVELOPMENT PROPOSAL

The architectural drawings for the subject SSDA has been prepared by Giles Tribe. The proposal is detailed in the plans and Environmental Impact Statement (EIS) that accompany this application. It is proposed to demolish the existing four non-contributory houses on the four subject properties and construction of a ten storey residential flat building with basement parking. The proposed building includes a four storey podium with two towers above. The podium has a setback from Balfour Street of 8m with a central entrance element further setback from the street. The podium is setback from the side (eastern and western) boundaries by 6m and the towers by 9m.

A modest part of the two proposed towers, including the lift overruns, exceeds the 28.6m maximum building height.

The lower two stories will be clad in sandstone, with brickwork above. The boundary fence will have a sandstone base with metal picket or metal panel above, to approximately 1.2 metres.

The proposed landscaping is designed by Studio IZ Pty Ltd.

## ASSESSMENT OF HERITAGE IMPACT

The proposed development will have an acceptable heritage impact, because:

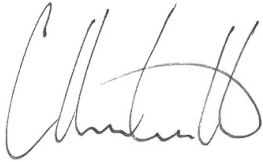
- The GBA analysis in this report concludes that the houses on the subject properties have been considerably altered from their original design and are non-contributory items in the Balfour Street / Highfield Road Conservation Area (see Appendix One). The HCA has already been altered with the demolition of the Federation Queen Anne house at 7 Balfour Street.
- The subject site is a Saved TOD Site. The TOD scheme is a NSW government initiative that allows for higher density development in areas surrounding a number of railway stations, including within heritage conservation areas. The legislated scheme allows for the redevelopment of the subject properties with a multi-storey apartment development.
- Ku-ring-gai Council has rezoned the subject site as R4 - High Density Residential. This demonstrates that Council has probably concluded that redevelopment of the subject and surrounding properties will have an acceptable heritage impact.
- A SSD application for the redevelopment of the adjacent site at 9-17 Balfour Street has been submitted. That site is also recognised as a Saved TOD site. The rezoning of much of the subject Conservation Area suggests a willingness on behalf of Ku-ring-gai Council for the redevelopment of the HCA. The existing setbacks, bulk, scale and character of the neighbouring buildings is likely to change to multi-storied apartments in the near to medium term. The proposal is in keeping with the likely future character of the streetscape and conservation area.
- While the proposal will alter the character of the conservation area, impacts on the conservation area will be mitigated through:
  - materiality and colour scheme respecting context,
  - facade articulation responding to adjacent scale,
  - tiered setbacks preserving streetscape views,
  - landscaped areas, including around the perimeter of the site, exceeding minimum requirements.Under the State government's TOD legislation and likely the updated LEP zoning, some impact on the conservation area's heritage values is inevitable. However, in its current likely form, the proposal is expected to have an acceptable level of impact on those heritage values.
- In terms of S5.10 of the KLEP 2015, the other houses in the subject conservation area are subject to future redevelopment and uplift. DPHI has already approved the redevelopment of 9-21 Beaconsfield Parade, Lindfield, which involved demolition of detached houses in the Frances Street HCA. The proposal will not negatively impact the heritage values of the conservation in its likely future form.
- The lower floors of proposed development will be clad in sandstone while the stories above will be clad in pale brick, in keeping with the materiality of neighbouring houses fronting Balfour Street within the conservation area.
- The proposal is largely in keeping with the relevant TOD provisions of the *SEPP (Housing) 2021*. The exceedance of the maximum building height is minor in scale and will generally not alter the permissible setting of this residential area. The proposed building height is reasonable and acceptable.
- The proposal is largely in keeping with the provisions of Ku-ring-gai Council's updated zoning to the *KLEP 2015*, including the subject site.



## RECOMMENDATION

DPHI should find that the proposal will not physically alter contributory items in the Balfour Street / Highfield Road Conservation Area and the proposed apartment building is generally in keeping with the provisions of *SEPP (Housing) 2021* and the *KLEP 2015*. DPHI should approve the proposed development.

Yours faithfully,  
GBA Heritage Pty Ltd



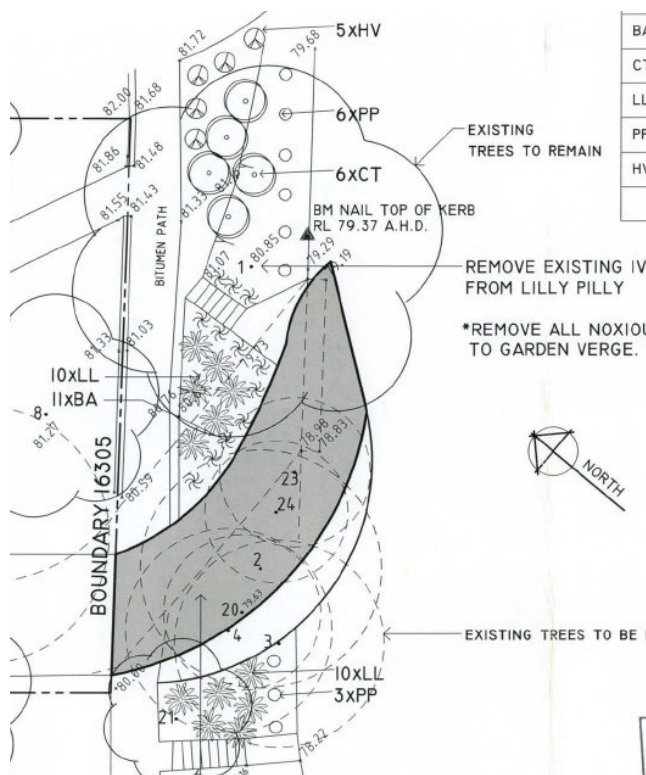
Dr Cameron Hartnell  
Senior Heritage Consultant  
cameronhartnell@gbaheritage.com

# APPENDIX ONE

## SHARED CHANGES ACROSS THE SUBJECT PROPERTIES

The 1943 aerial photograph (Figure 4) indicates that, due to the steep change of levels between the street and the front property boundaries, there were originally no driveways to or onto the frontages of Nos 21, 23 and 25 Balfour Street.

Documentary and physical evidence show that later driveways were constructed to Nos 21, 23 and 25 Balfour Street. The only plan for a driveway available in Council's files is related to No. 23, dated 2009 (DA 327/09).



**Figure 9**  
2009 plan for a new driveway to 23 Balfour Street  
Source: DA 327/09



**Figure 10**  
The 2009 driveway to 23 Balfour Street  
Source: Google Streetview, 2013



**Figure 11**  
The driveway to 21 Balfour Street  
Source: Google Streetview

### 19 Balfour Street, Lindfield

The following figures document the alterations and additions made to 19 Balfour Street, Lindfield.



**Figure 12**

1943 aerial photograph. 19 Balfour Street is visible (centre)

Source: *LRS SIX maps*



**Figure 13**

Oblique view of 19 Balfour Street, much altered from the original

Source: *Nearmap*



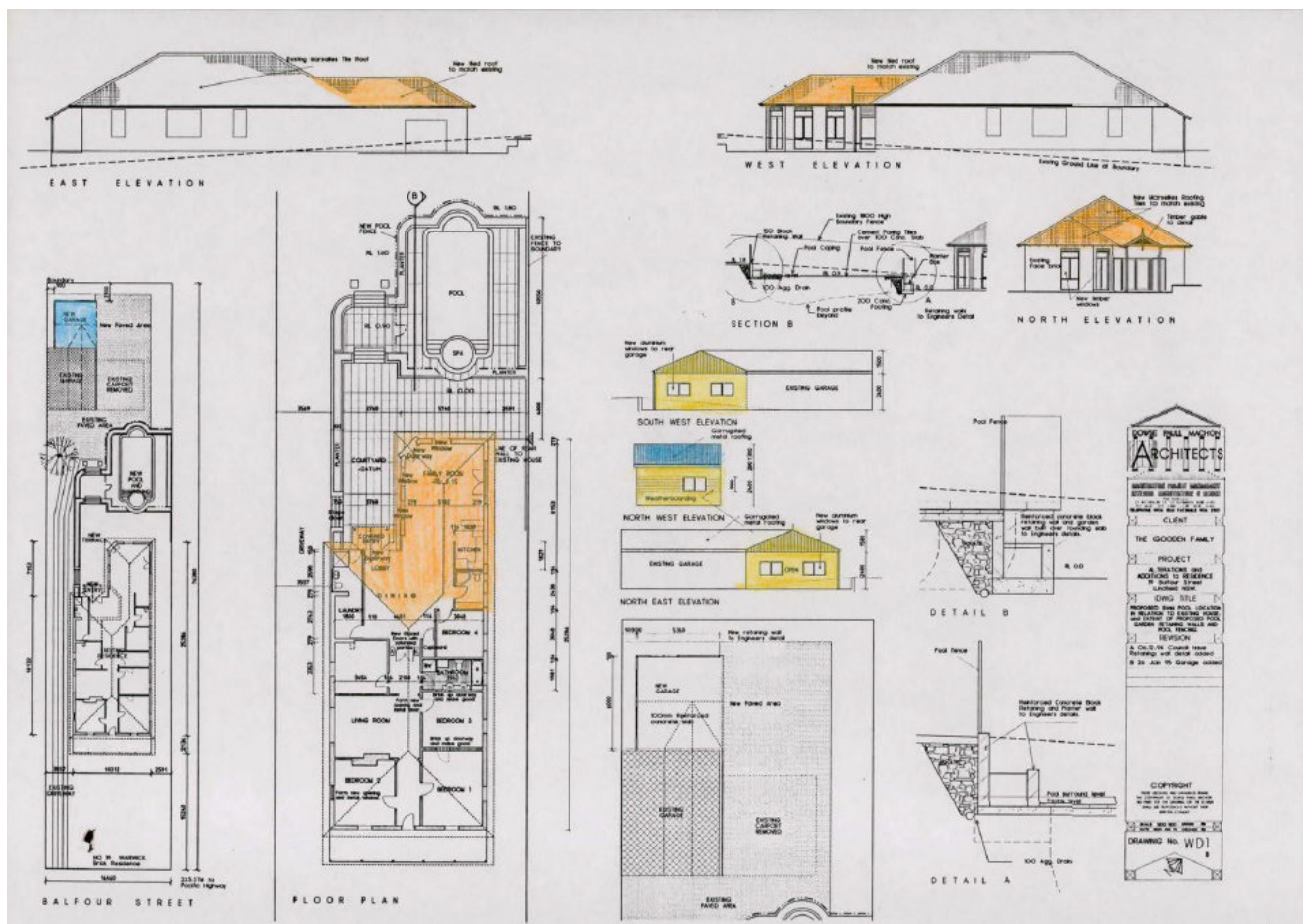


**Figure 14**  
The rear and side elevations of 19 Balfour Street



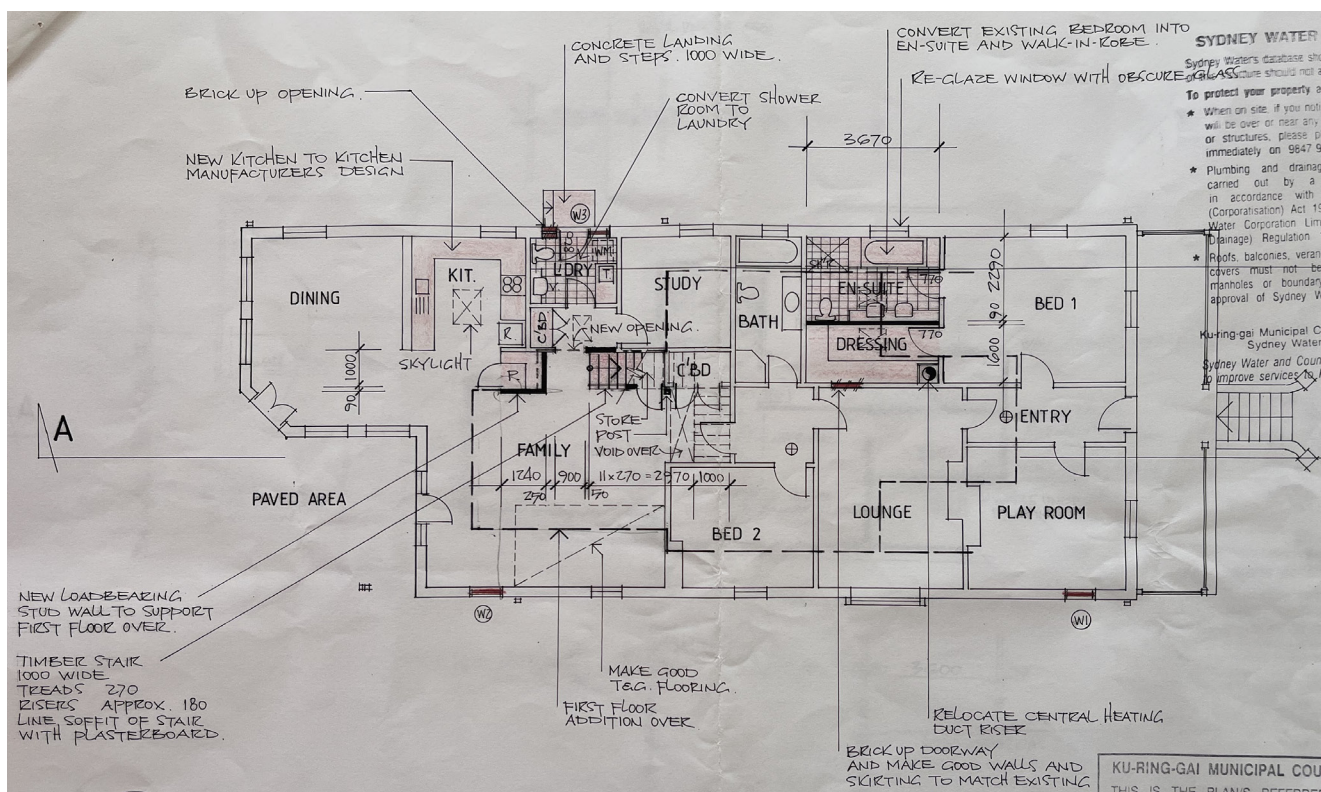
**Figure 15**  
The rear of 19 Balfour Street



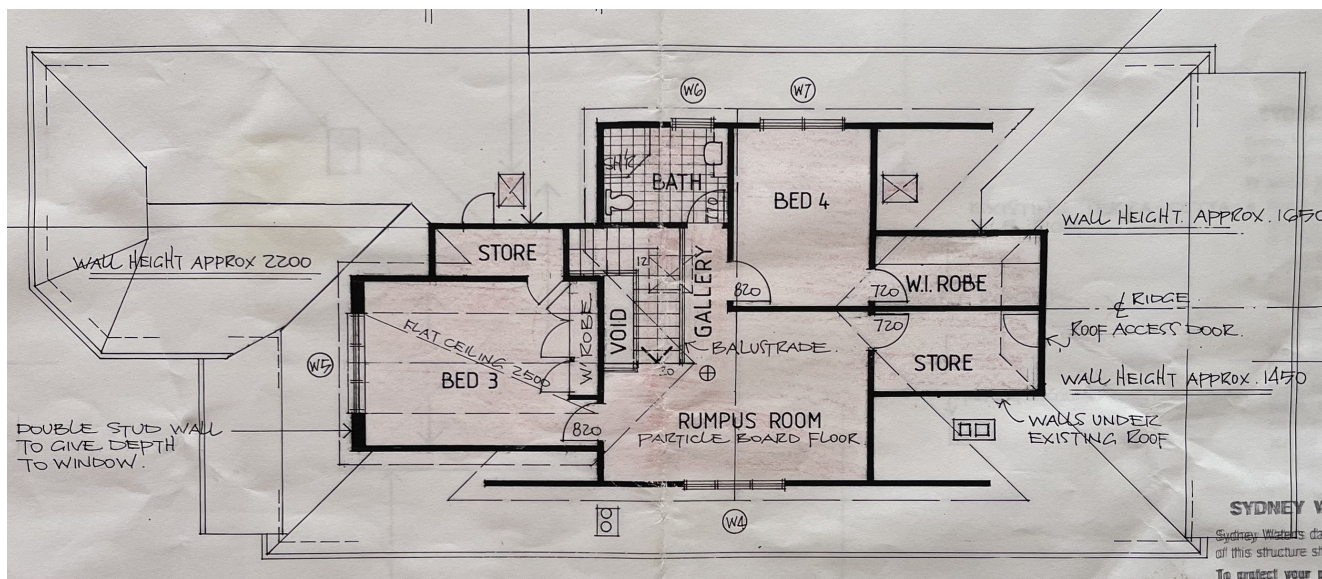


**Figure 16 (above)**  
19 Balfour Street: 1995 addition of new ground floor rear wing  
Source: DA 375/95

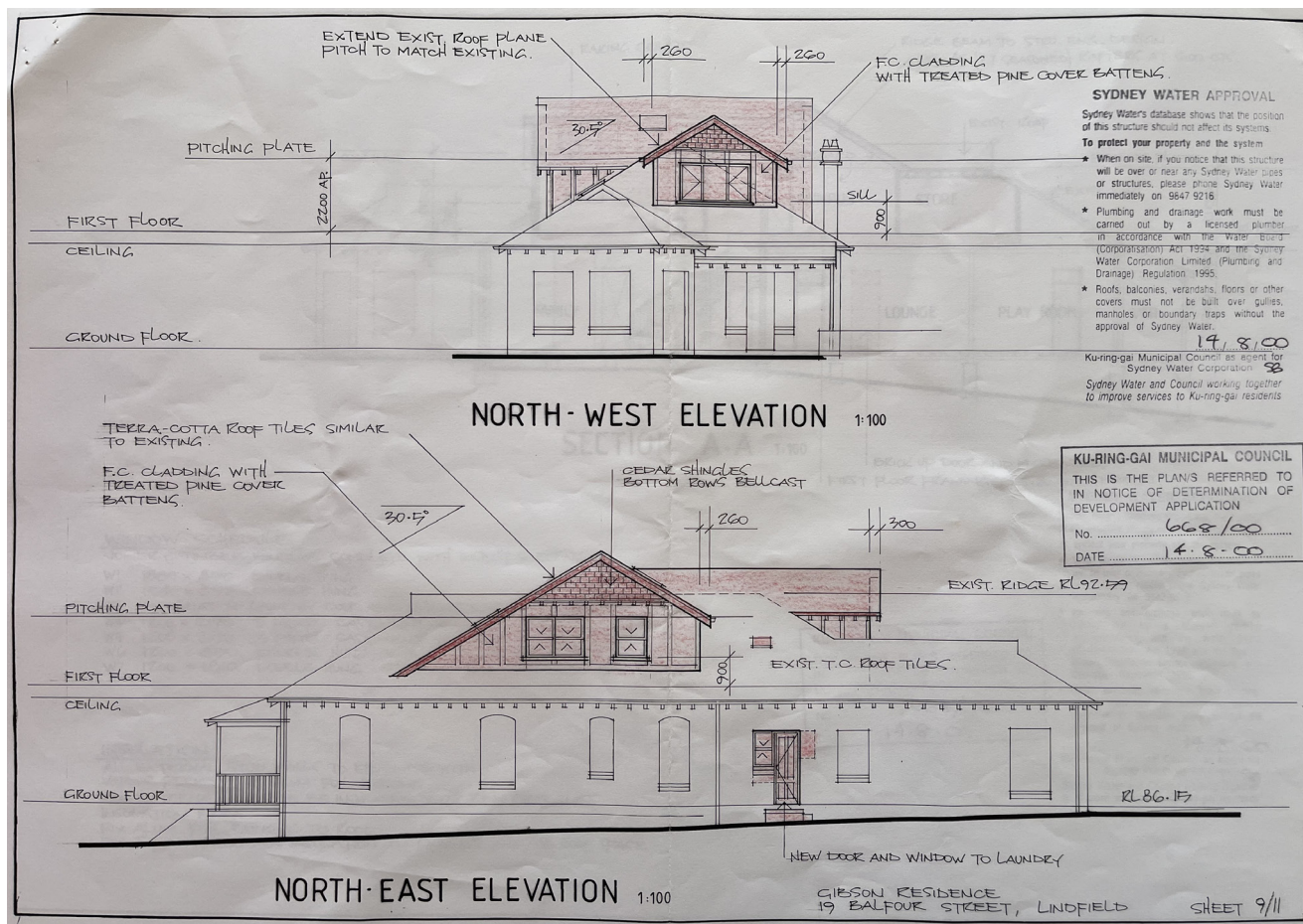
**Figure 17 (below)**  
19 Balfour Street: 2000 alterations and additions ground floor plan  
Source: DA 668/00







**Figure 18**  
19 Balfour Street: 2000 alterations and additions. First floor plan  
Source: DA 668/00



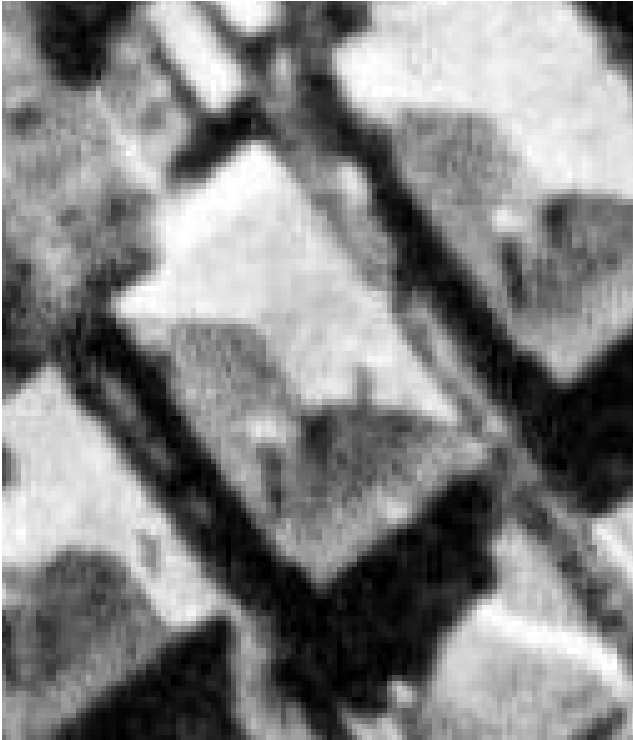
**Figure 19**  
19 Balfour Street: 2000 alterations and additions, elevation drawings  
Source: DA 668/00





## 21 Balfour Street

The following figures document the alterations and additions made to 21 Balfour Street, Lindfield.



**Figure 21**

1943 aerial photograph. 21 Balfour Street is visible (centre)

Source: *LRS SIX maps*



**Figure 22**

Oblique view of 21 Balfour Street, much altered from the original

Source: *Nearmap*





**Figure 23**  
21 Balfour Street: the side elevation with 1988 additions



**Figure 24**  
Both 19 and 21 Balfour were originally designed as similar houses







## **Integrity of 21 Balfour Street**

### **The primary changes comprise:**

- 1979 ground floor rear addition of attached carport and some internal alterations.
- 1988 Extensive two-storey additions across rear of house and adjoining internal alterations.
- Later driveway.

### **Impact on Early Integrity**

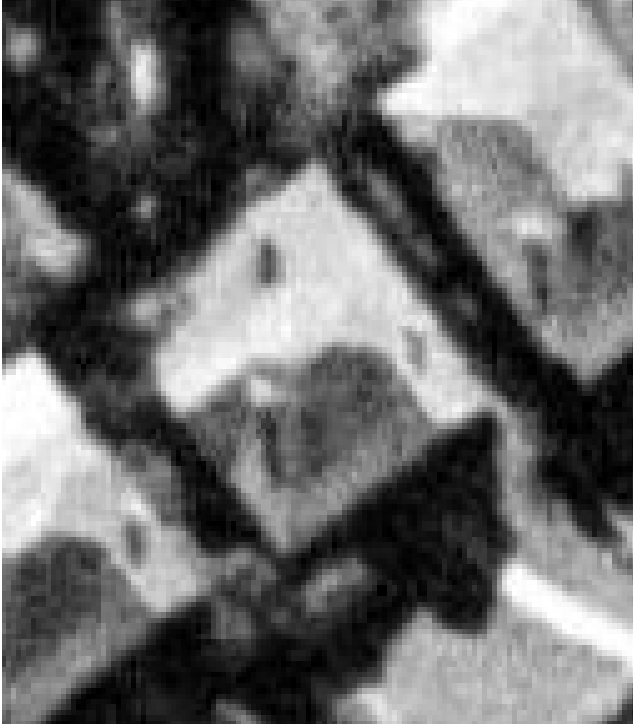
- Major changes to original roof composition by 2000 upper floor addition.
- Roof line with prominent cross ridge and large gables to each side elevation.
- Large rear increase to ground floor.
- Total architectural changes to rear elevation.
- The later driveway negatively impacts the setting of the house.

### **Level of Contribution:**

21 Balfour Street should be considered a **Non-Contributory** item.

### 23 Balfour Street

The following figures document the alterations and additions made to 23 Balfour Street, Lindfield.



**Figure 27 (above)**  
1943 aerial photograph. 23 Balfour Street is visible (centre)  
*Source: LRS SIX maps*

**Figure 28 (below)**  
Oblique view of 23 Balfour Street, much altered from the original  
*Source: Nearmap*







**Figure 29**  
23 Balfour Street: the rear addition is very visible from the front garden of the adjoining property



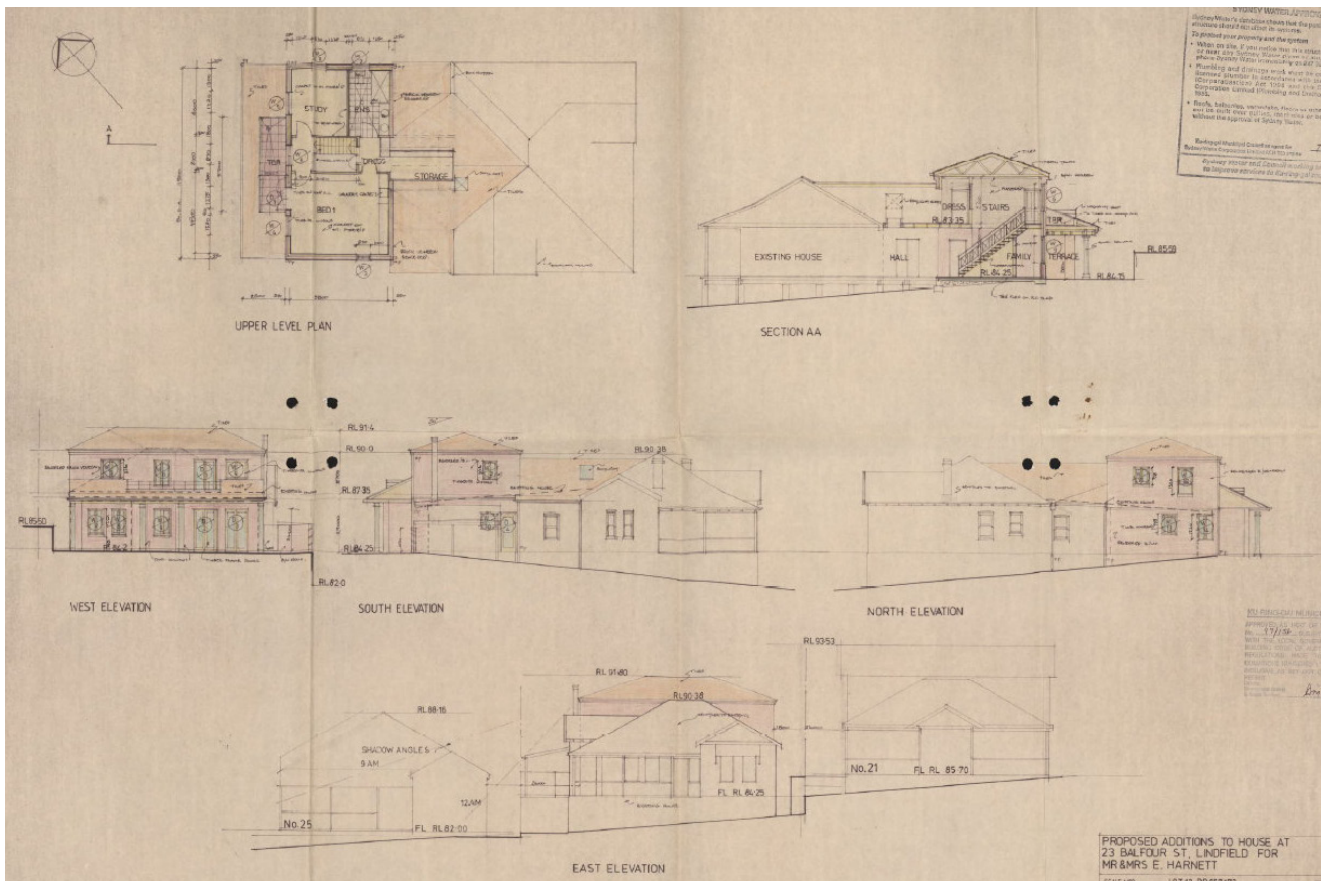
**Figure 30**  
23 Balfour Street: the two-storey wing added in 1997 totally changed the rear part of the dwelling



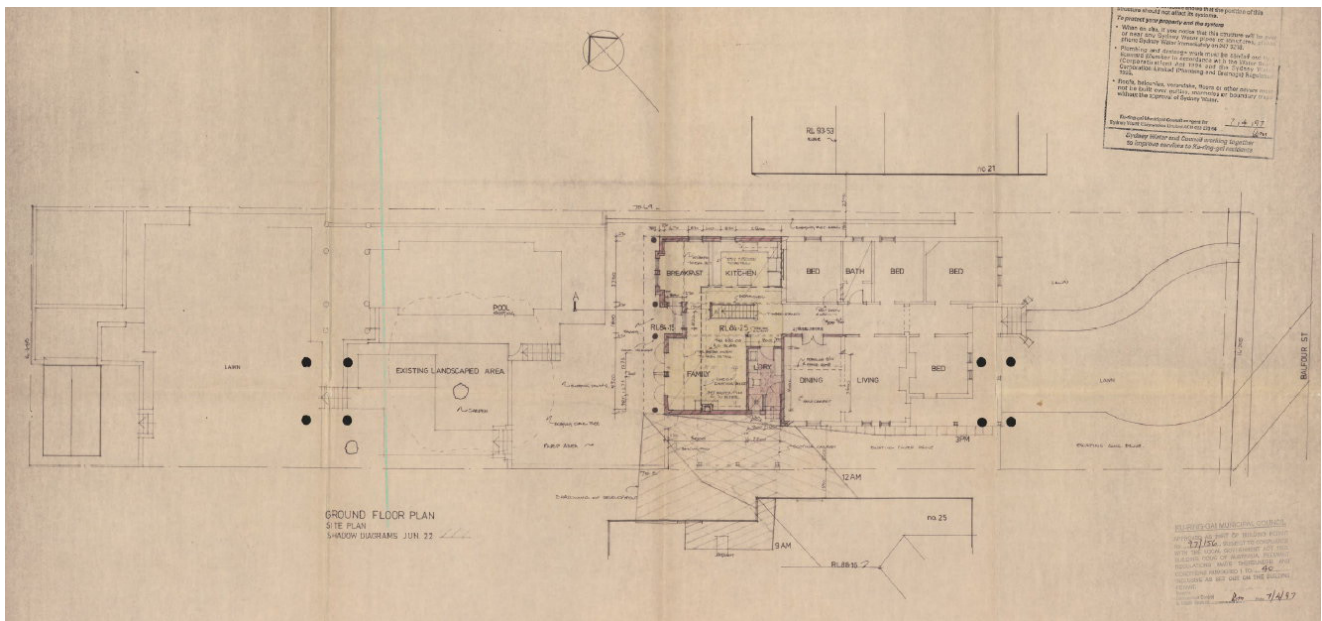


**Figure 31 (above)**  
23 Balfour Street: interior of the new addition

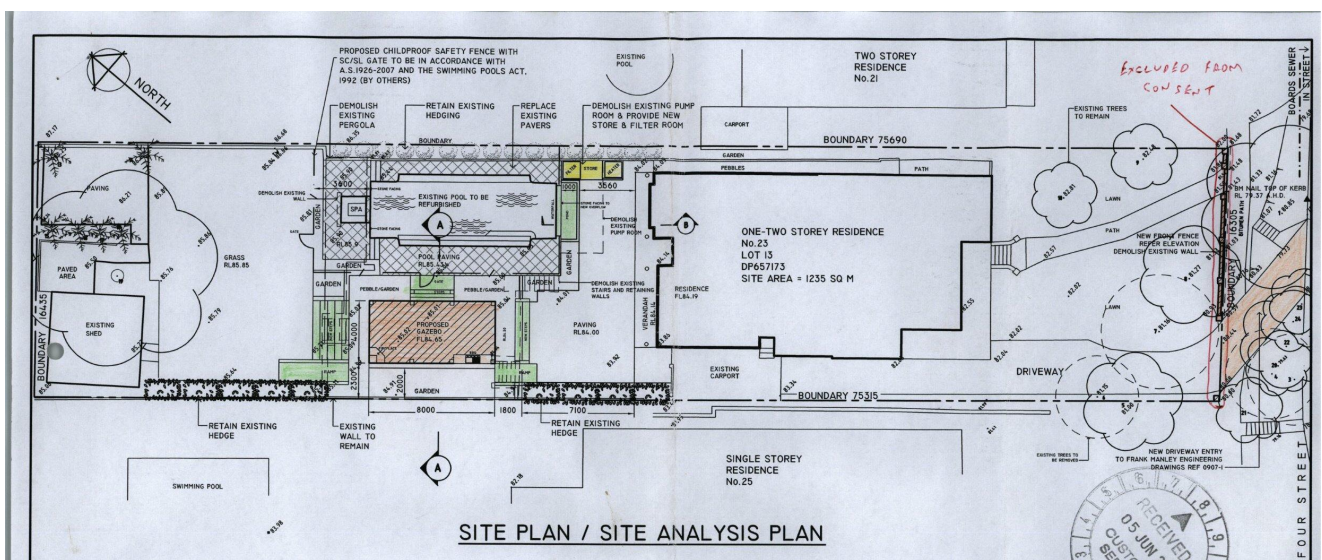
**Figure 32 (below)**  
23 Balfour Street: 1997 two storey rear addition  
Source: DA 156/97







**Figure 33**  
23 Balfour Street: 1997 two-storey rear addition, ground floor plan  
Source: DA 156/97



**Figure 34**  
23 Balfour Street: rear garden works after second storey was added in 2009  
Source: DA 327/09

## **Integrity of 23 Balfour Street**

### **The primary changes comprise:**

- 1997 demolition of rear section of house and new two storey addition.
- C.2009 driveway off Balfour Street.

### **Impact on Early Integrity**

- Major changes to original roof composition by 1997 two-storey addition.
- Major impact from removal of rear sections of the original house.
- Large rear increase to ground floor.
- Total architectural changes to rear elevation.
- The 2009 driveway negatively impacts the setting of the house.

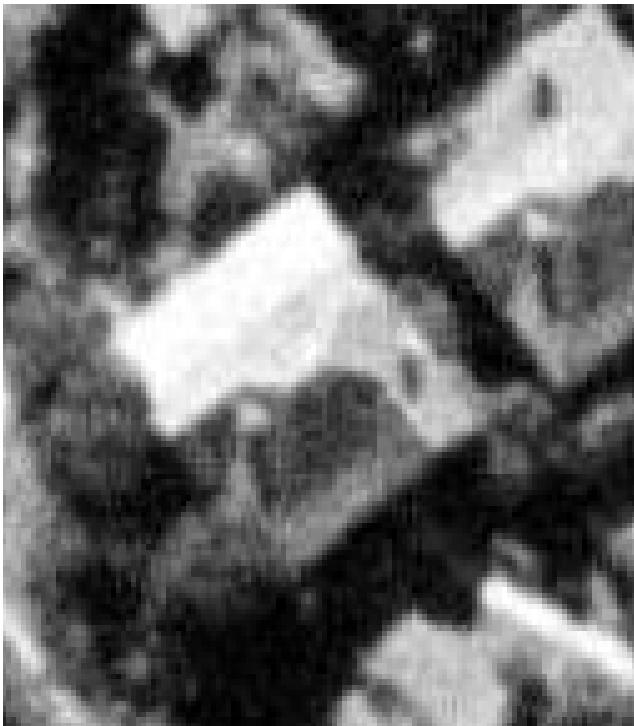
### **Level of Contribution:**

23 Balfour Street should be considered a **Non-Contributory** item.



## 25 Balfour Street

The following figures document the alterations and additions made to 25 Balfour Street, Lindfield.



**Figure 35 (above)**  
1943 aerial photograph. 25 Balfour Street is visible (centre)  
Source: *LRS SIX maps*

**Figure 36 (below)**  
Oblique view of 25 Balfour Street, much altered from the original  
Source: *Nearmap*







**Figure 37 (above)**

25 Balfour Street: the 2016 basement garage under the front verandah generates a major visual change. Nos 23 and 24 were originally designed as similar houses

**Figure 38 (below)**

25 Balfour Street: view of the expansive rear addition from No. 23 rear garden





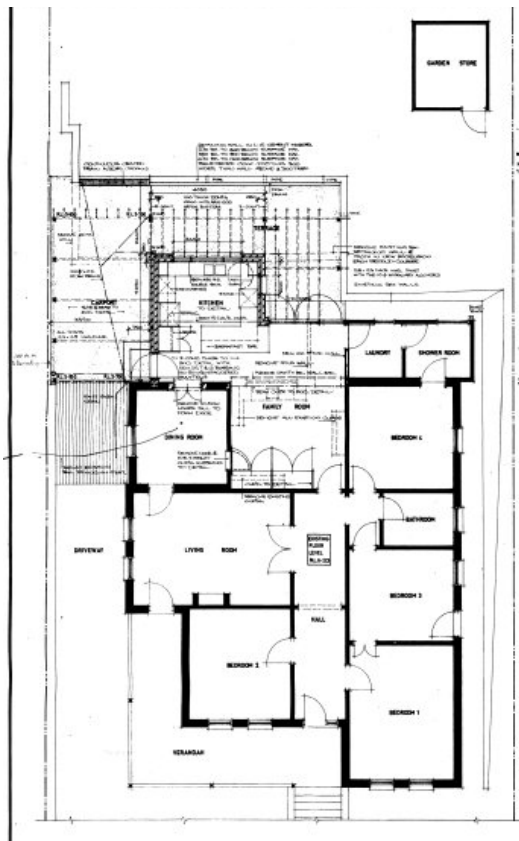


Figure 39 (above)  
25 Balfour Street: 1974 rear additions and changes  
Source: DA 1535/74

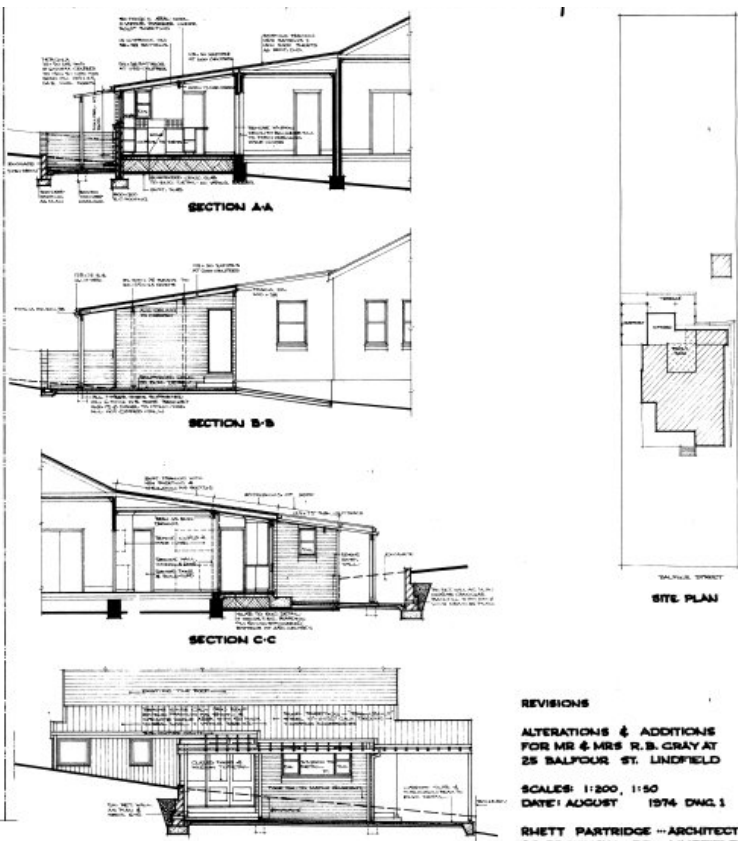
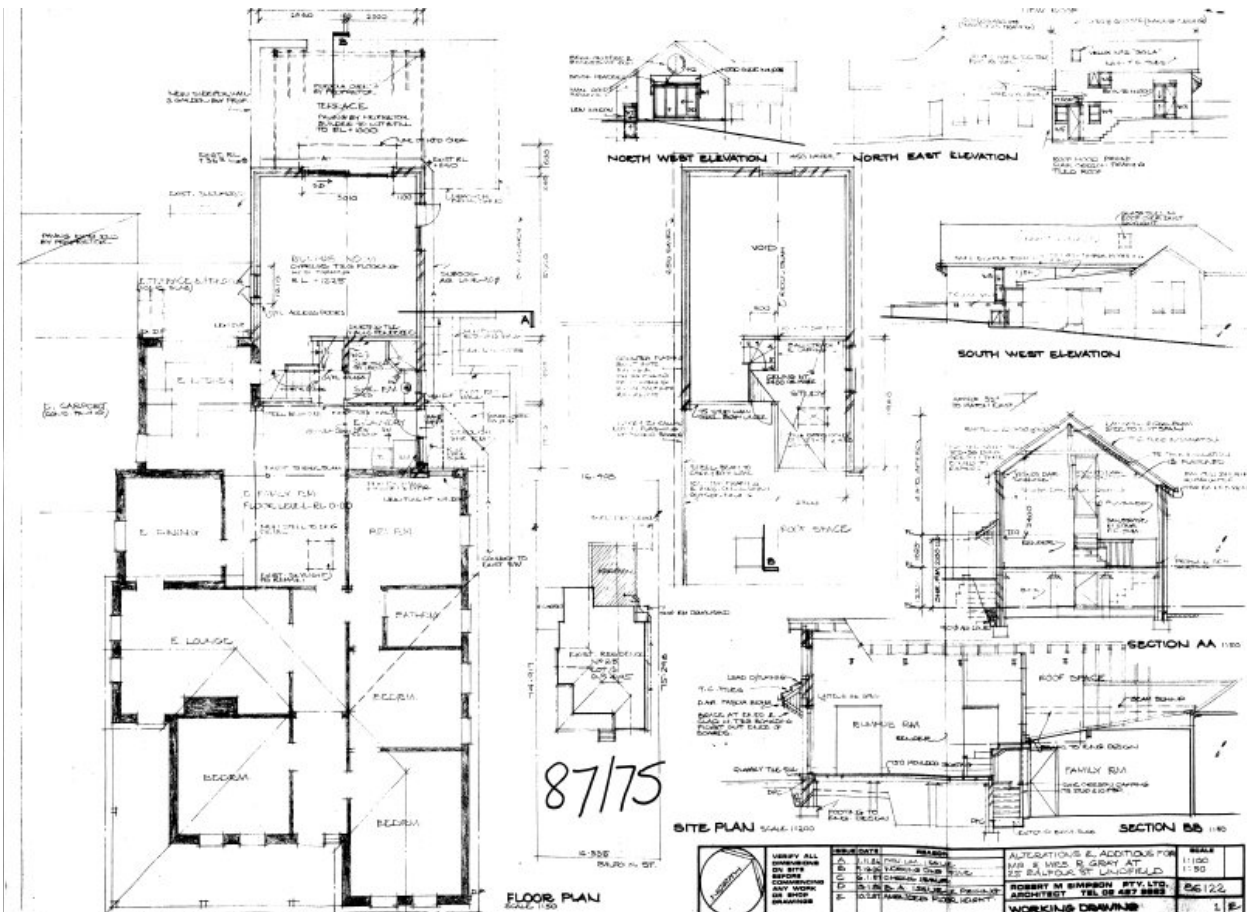
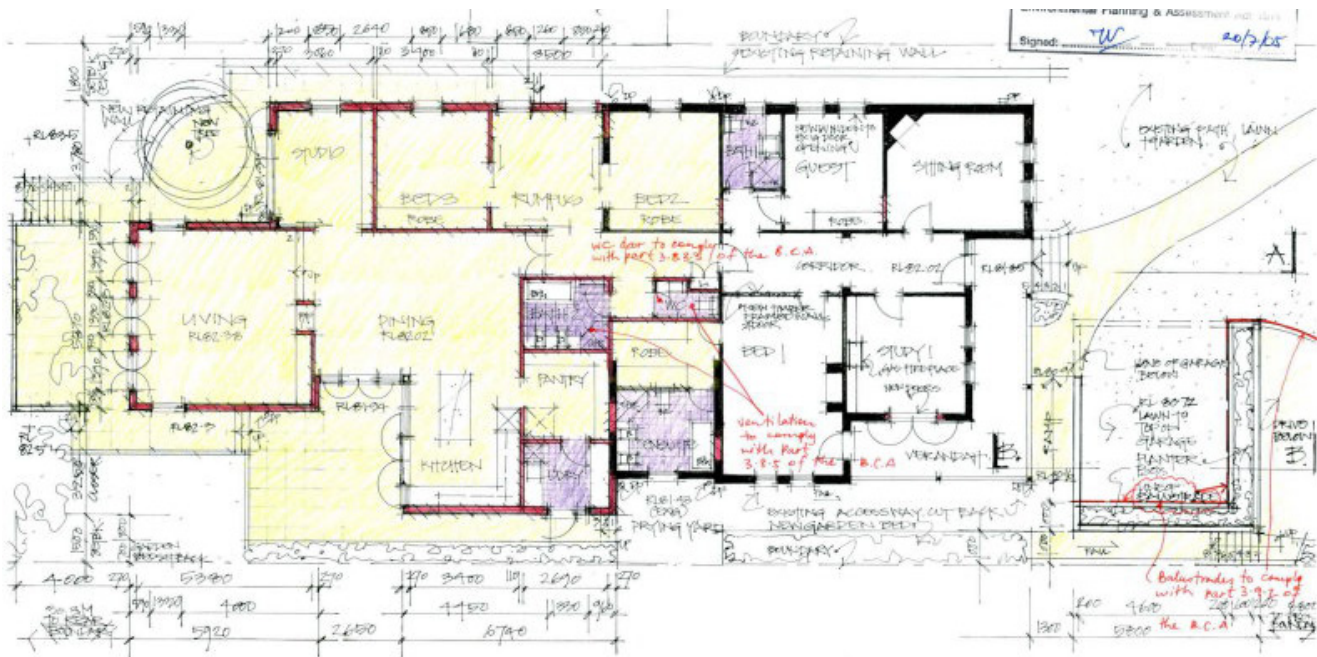


Figure 40 (below)  
25 Balfour Street: 1987 rear additions and changes  
Source: DA 75/87





**Figure 41**  
25 Balfour Street: 2006 major alterations and large rear wing.  
Ground floor plan  
Source: DA 1190/04



**Figure 42**  
25 Balfour Street: 2005 major alterations and large rear wing. West elevation. The front carpark (right) was not built, as shown by 2016 existing site plan  
Source: DA 1190/04











## **Integrity of 25 Balfour Street**

### **The primary changes comprise:**

- 1987 Large ground floor rear addition and adjoining internal alterations.
- 2005 Major new rear addition and alterations to the rear of original house.
- 2016 Basement parking garage and storerooms inserted below front portion of the house.

### **Impact on Early Integrity**

- Original front elevation extensively changed by new double basement garage entry.
- Front garden extensively changed by large driveway to double garage.
- Extensive new basement parking and storage below original house.
- Complete redevelopment of rear of the house with very large single storey rear addition.
- The front garden of No 25 Balfour has changed the most over time and is now reduced in presentation by the expanded driveway to the double garage doors below the front verandah.

### **Level of Contribution:**

25 Balfour Street should be considered a **Non-Contributory** item.