

4 June 2025

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 Council to evaluate the project in terms Section 161 of *State Environmental Planning Policy (SEPP) (Housing) 2021*, which references the Apartment Design Guide. 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 SEPP.

EXECUTIVE SUMMARY

This Statement of Heritage Impact report has been prepared by GBA Heritage on behalf of Balfour Group Pty Ltd to accompany a State Significant Development Application (SSDA) for a proposed residential flat building (including in-fill affordable housing) at 19 – 25 Balfour Street, Lindfield, within the Ku-ring-gai Local Government Area (LGA).

This report has been prepared to address the Secretary's Environmental Assessment Requirements (SEARs) issued for the project (SSD-82709458) on 22 April 2025. This report addresses the heritage provisions of S5.10 of the *Ku-ring-gai Local Environmental Plan 2015*.

Ku-ring-gai Council has proposed a preferred scenario for Lindfield that would extinguish the listing of the Balfour Street / Highfield Road Conservation Area on schedule 5 of the *KLEP 2015* and allow for higher development in that area.

This report concludes that the proposed residential flat building is suitable and warrants approval.

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INTRODUCTION

The 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 featuring:
 - o basement level car parking
 - o approximately 71 market residential units
 - o approximately 27 affordable housing units
- associated landscaping works, including a communal open space.
- associated infrastructure and services

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. It is zoned R2 Low Density Residential pursuant to the *Ku-ring gai Local Environmental Plan 2015 (KLEP 2015)*.

The subject site is located within the Lindfield Transport Oriented Development (TOD) area, pursuant to Chapter 5 of the Housing SEPP (Figure 2).

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*.



Figure 1
Site location
Source: Nearmap

Figure 2
TOD Map
Source: ESpatial Viewer



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.



Figure 3
Site Context
Source: Nearmap

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*.

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 an item 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.



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 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 6
The front facade of 6 Highfield Road Lindfield (I39)
Source: NSW Heritage Inventory

ESTABLISHED SIGNIFICANCE OF THE BALFOUR STREET / HIGHFIELD ROAD CONSERVATION AREA CONSERVATION AREA

The subject properties are located within the boundaries of the Balfour Street / Highfield Road Conservation Area, which is listed as an item of local heritage significance on Schedule 5 of the *KLEP 2015*.

The NSW Heritage Inventory contains the following information for heritage item ID 1882680, *Balfour Street / Highfield Road Conservation Area*:

Statement of Significance:

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.

Contribution the Subject Buildings Make to the Conservation Area

Part 19 of the *Ku-ring-gai DCP 2024* defines contributory properties as buildings and sites that exhibit one or more of the following characteristics:

- i) buildings and sites that make an important contribution to the character and significance of the HCA. They can be from a key historical layer, true to an architectural type, style or period, or highly or substantially intact including their garden setting. Where subdivision has occurred, the subdivision is within the key historical period or the area.*
- ii) buildings and sites which are altered from their original form but are recognisable and could be reasonably reinstated to that condition or the alterations are not considered to be detrimental to the integrity of the building; for example, a building that has been rendered or painted or where the roof cladding has been replaced but the form is otherwise legible.*
- iii) buildings and sites with new layers/additions sensitive to the style, form, bulk, scale and materials of the original building.*

The following aerals, taken in 1943 and 2025, evidence considerable alterations to the subject houses.



Figure 7 (above)
 1943 aerial photograph. The subject properties are identified and outlined in red
 Source: LRS SIX maps

Figure 8 (below)
 2025 aerial photograph. The subject properties are identified and outlined in red
 Source: Nearmap



SHARED CHANGES ACROSS VARIOUS 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).

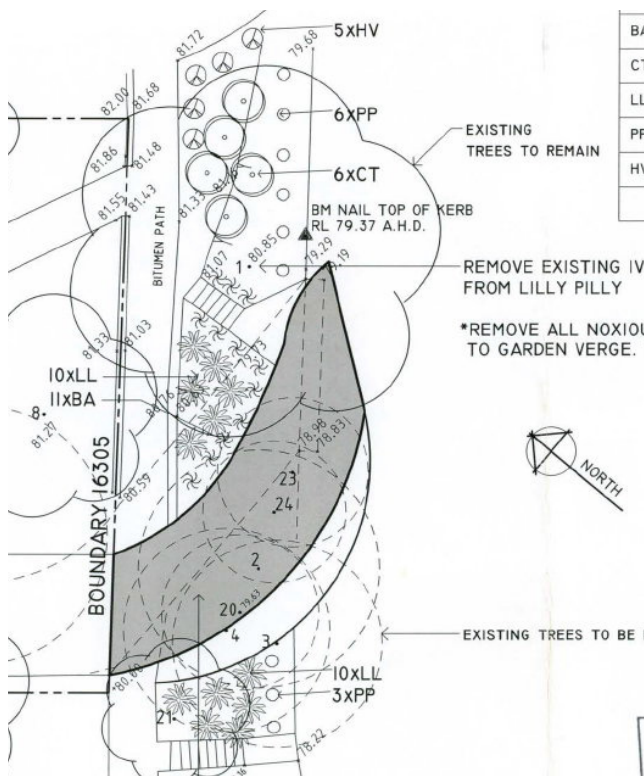


Figure 9
2009 plan for a new driveway to 23 Balfour Street
Source: DA 327/09



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.

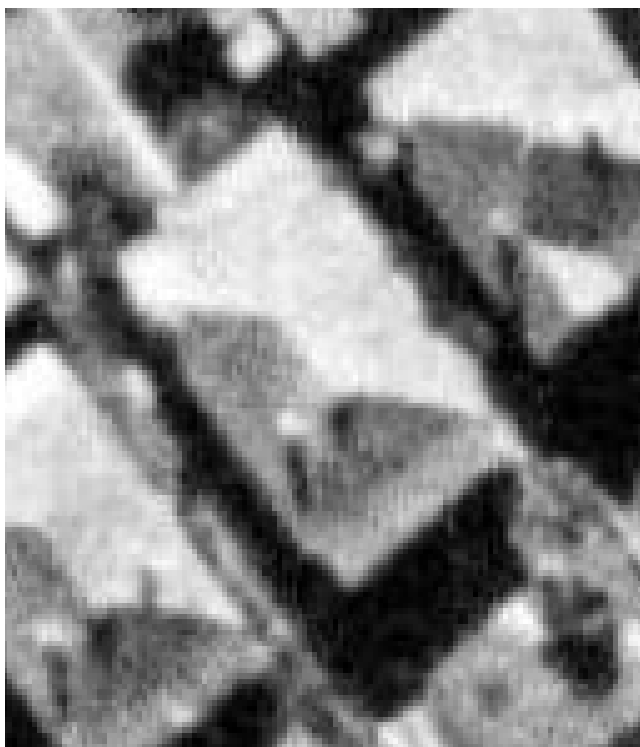


Figure 12

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

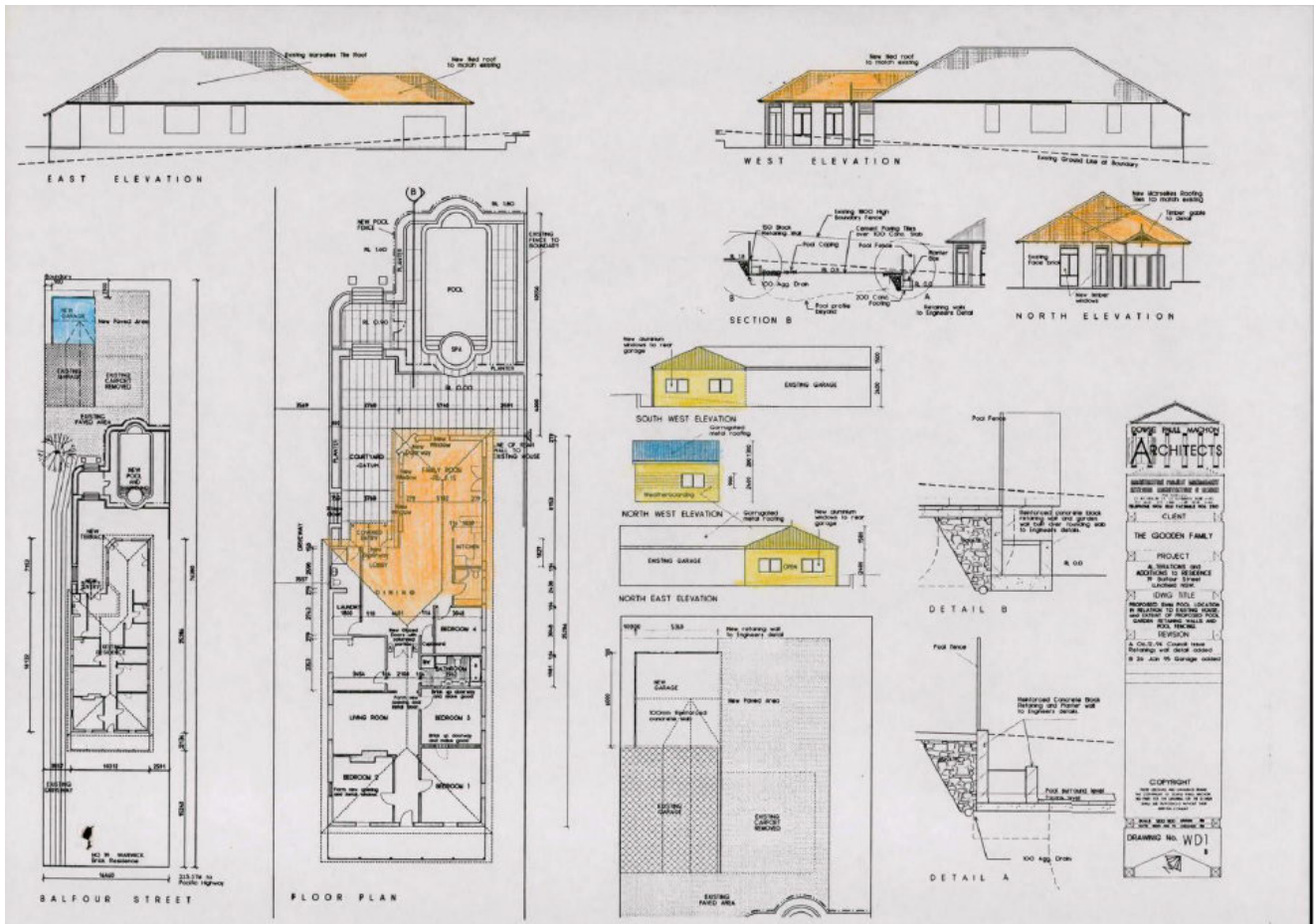
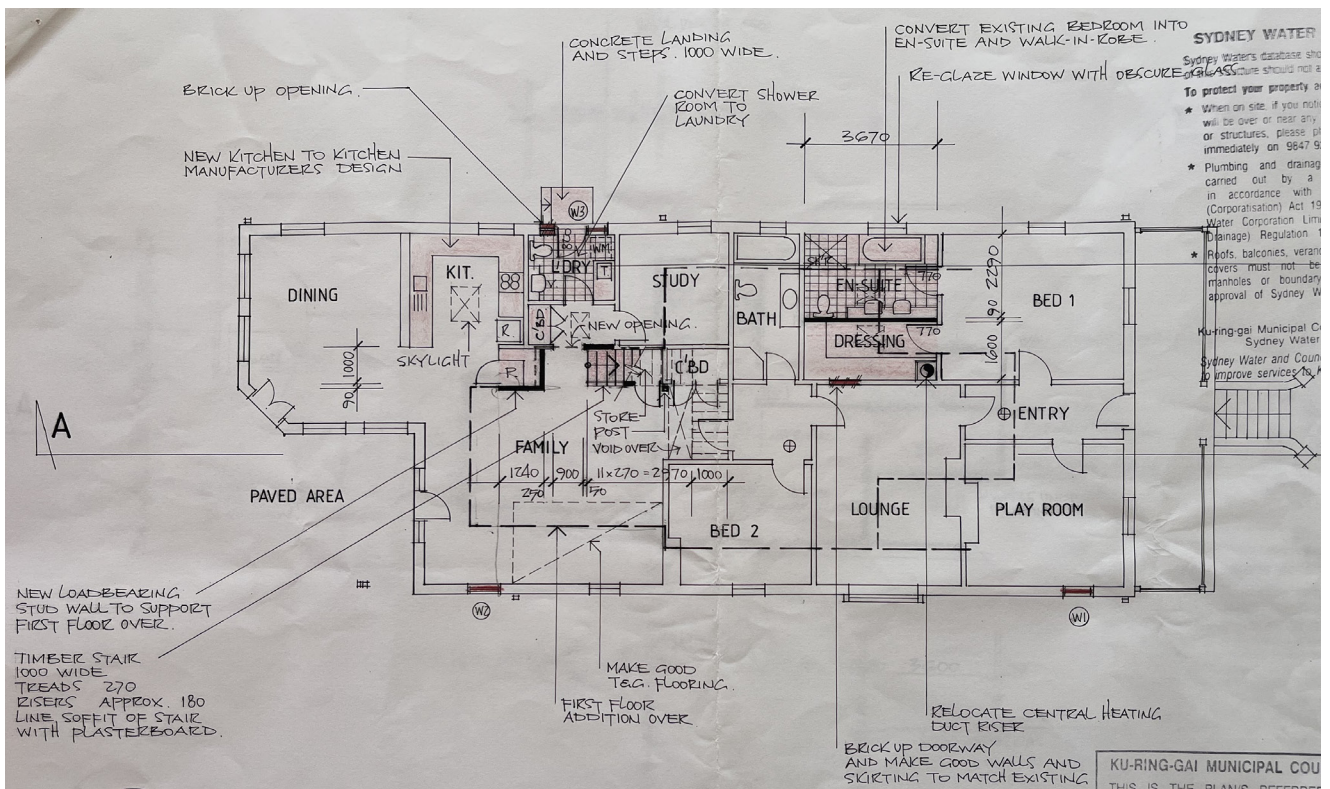


Figure 16 (above)
19 Balfour Street: 1995 addition of new ground floor rear wing
Source: DA 375/95

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



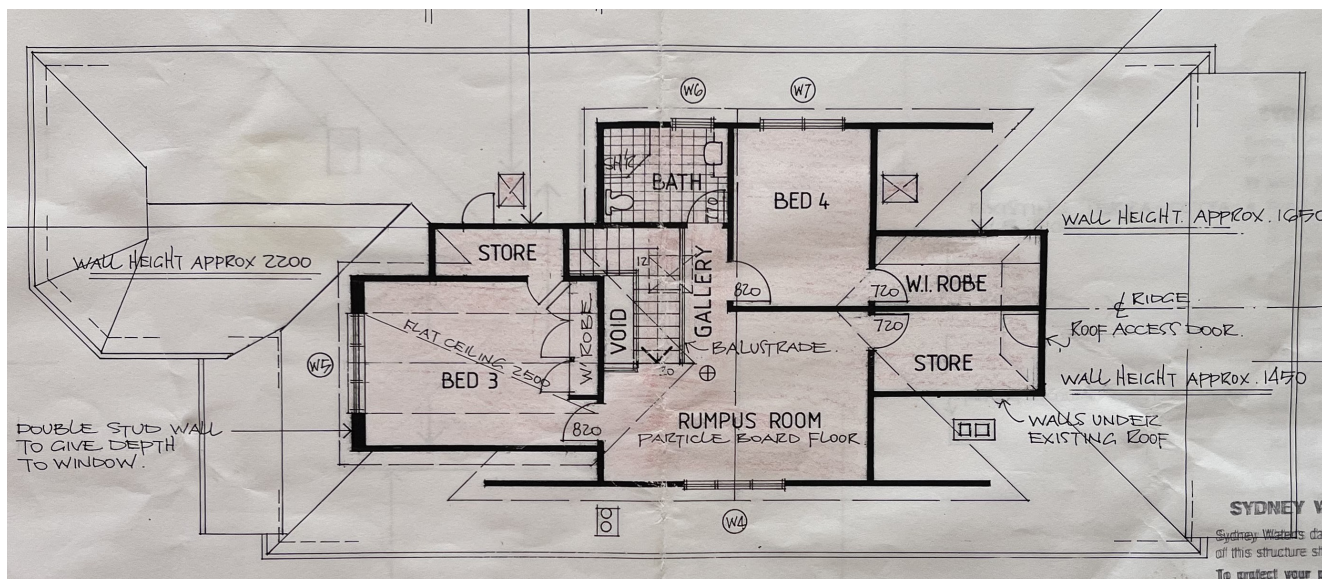


Figure 18
19 Balfour Street: 2000 alterations and additions. First floor plan
Source: DA 668/00

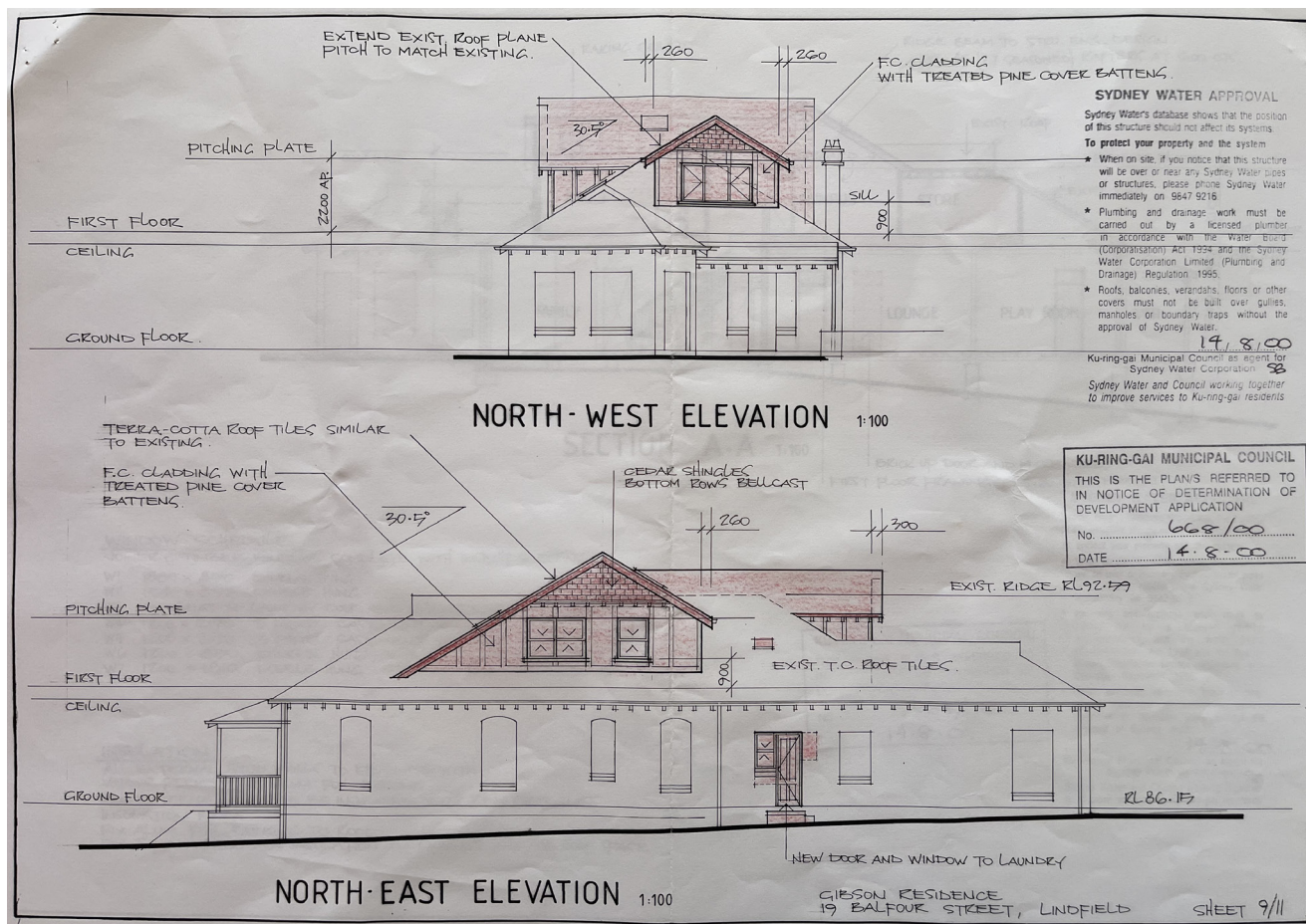


Figure 19
19 Balfour Street: 2000 alterations and additions, elevation drawings
Source: DA 668/00

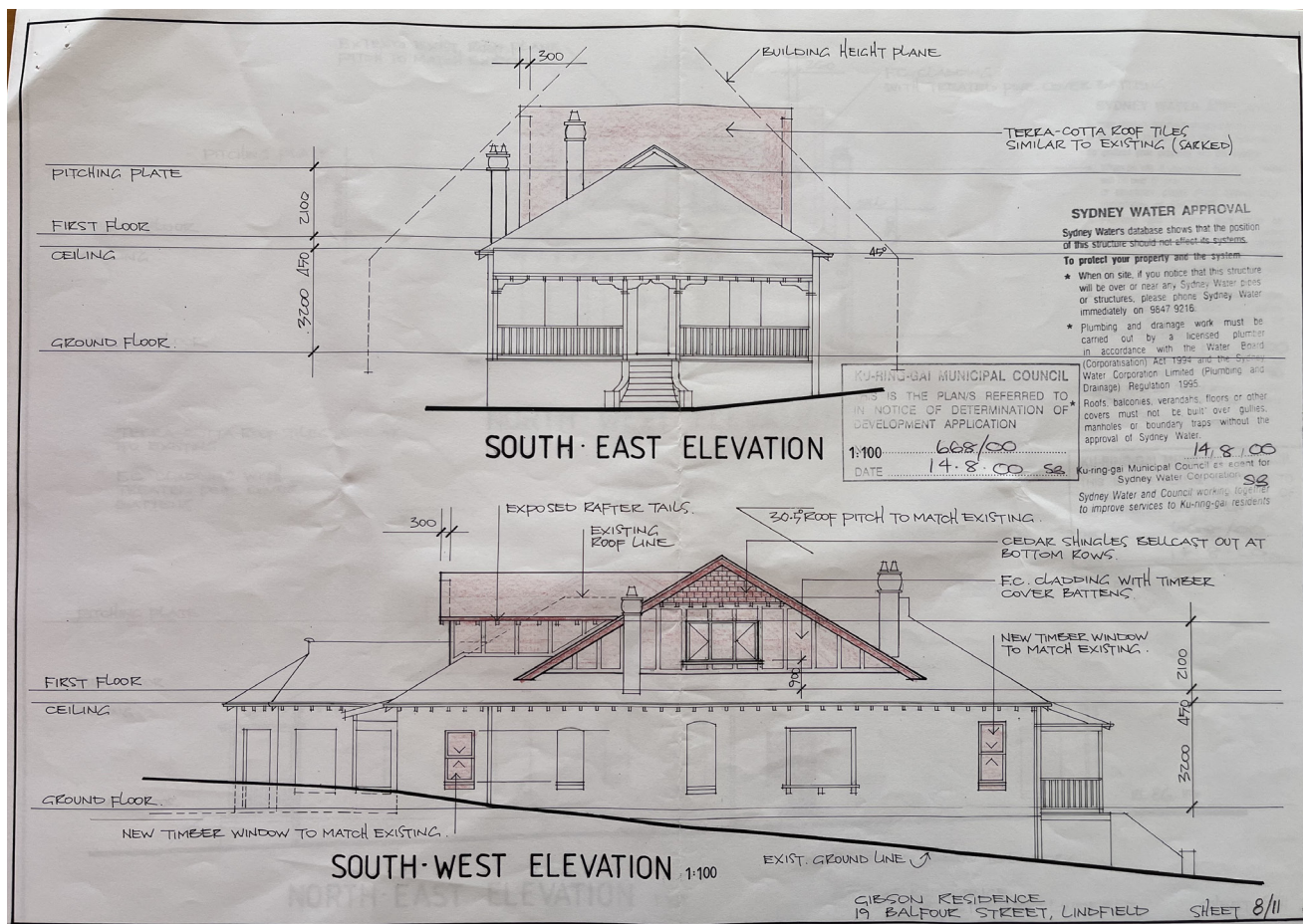


Figure 20
 19 Balfour Street: 2000 alterations and additions, elevation drawings. The new cross ridge is very visible on the front (SE) elevation
 Source: DA 668/00

Integrity of 19 Balfour Street

The primary changes comprise:

- 1995 ground floor rear addition and adjoining internal alterations.
- 2000 extensive two storey additions across the middle of the house.

Impact on Early Integrity

- Front elevation remains relatively intact, but visually dominated by introduced cross ridge
- Major changes to original roof composition by 2000 upper floor addition.
- Roof line with prominent cross ridge and large gables to each side elevation.
- Roof line with large rear dormer.
- Rear ground floor wing.
- Extensive changes to ground floor interior from both 1995 and 2000 alterations.

Level of Contribution:

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

21 Balfour Street

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

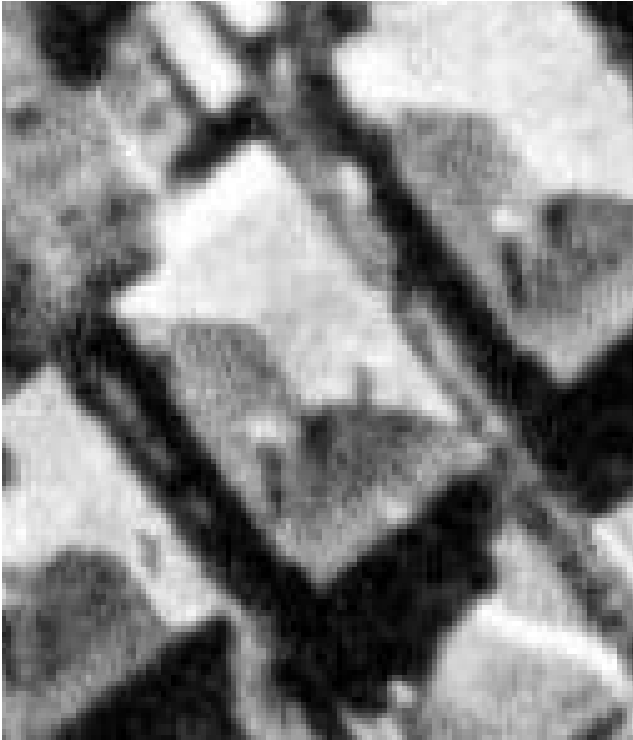


Figure 21

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

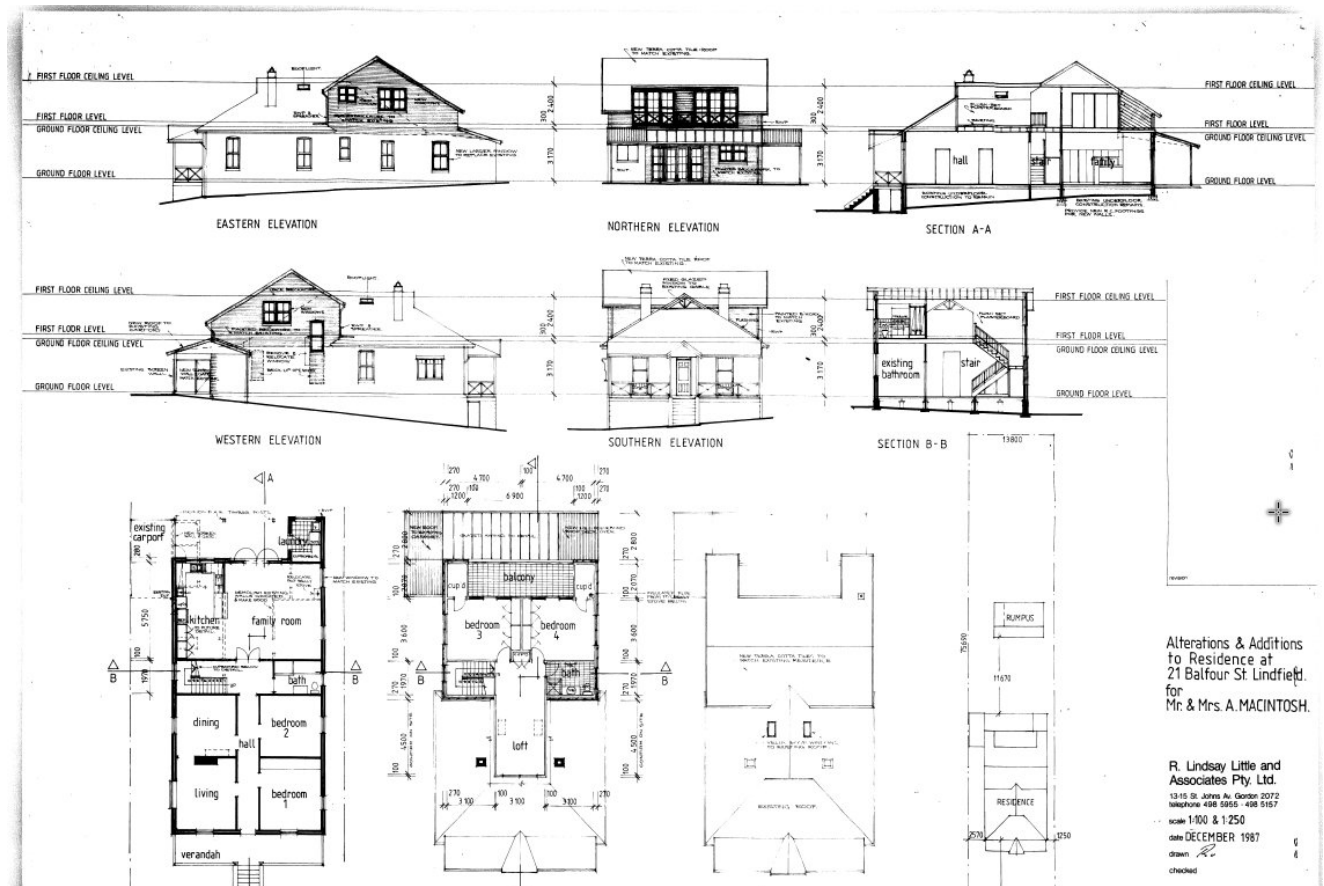
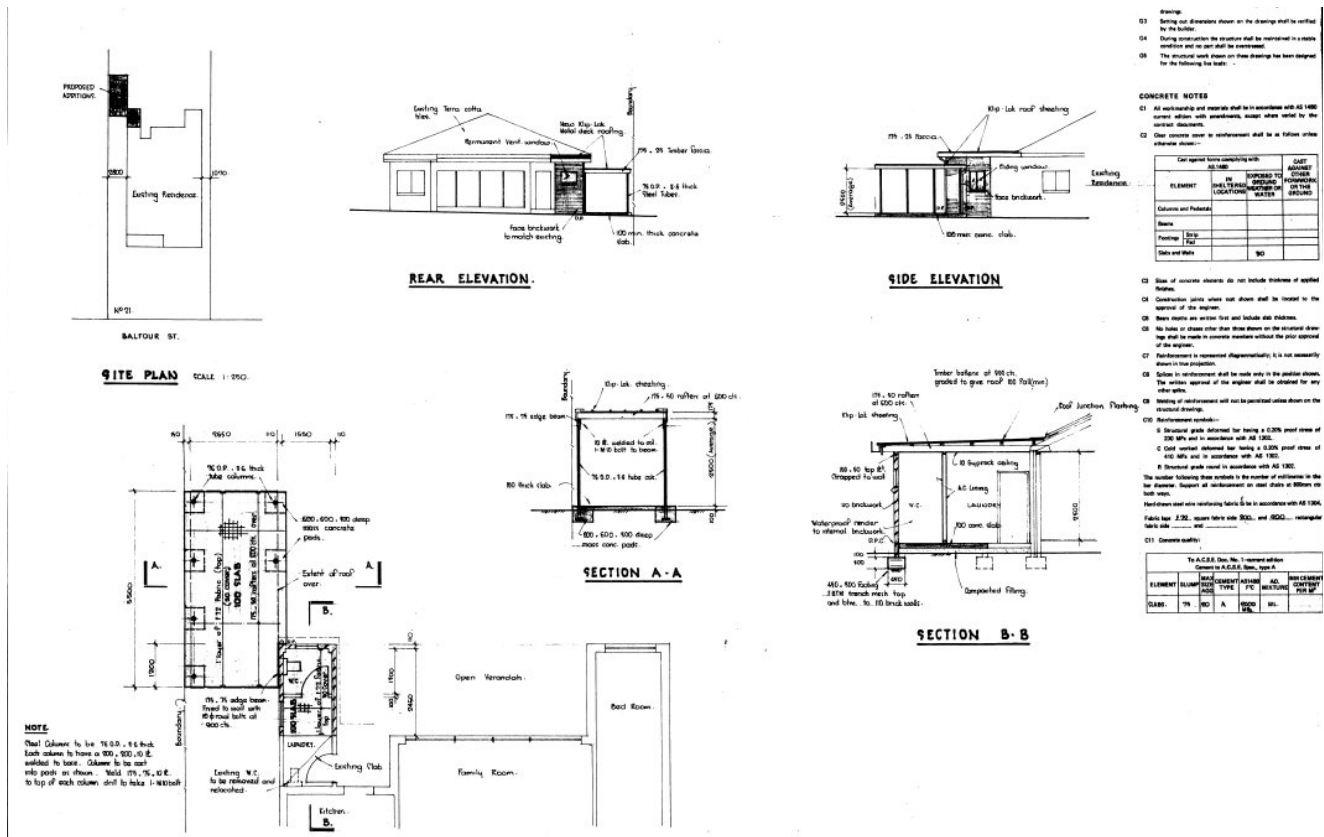
Source: *Nearmap*



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.

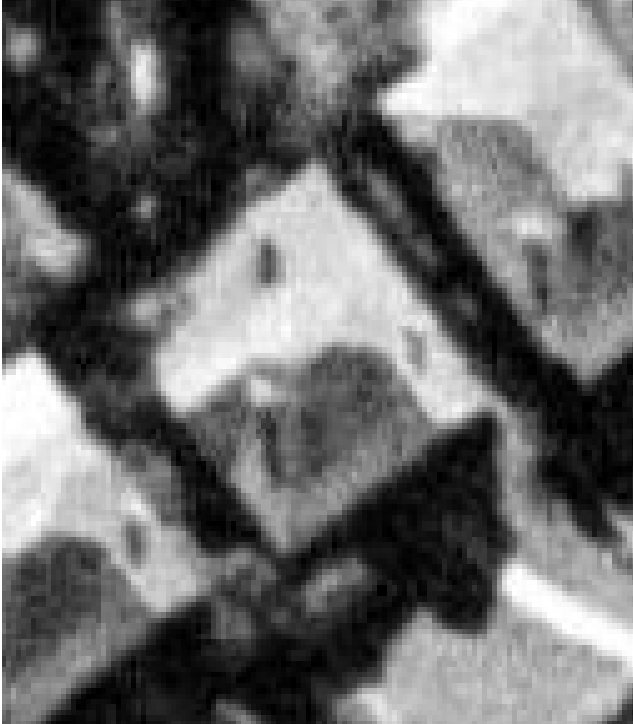


Figure 27 (above)
1943 aerial photograph. 23 Balfour Street is visible (centre)
Source: LRS SIX maps

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

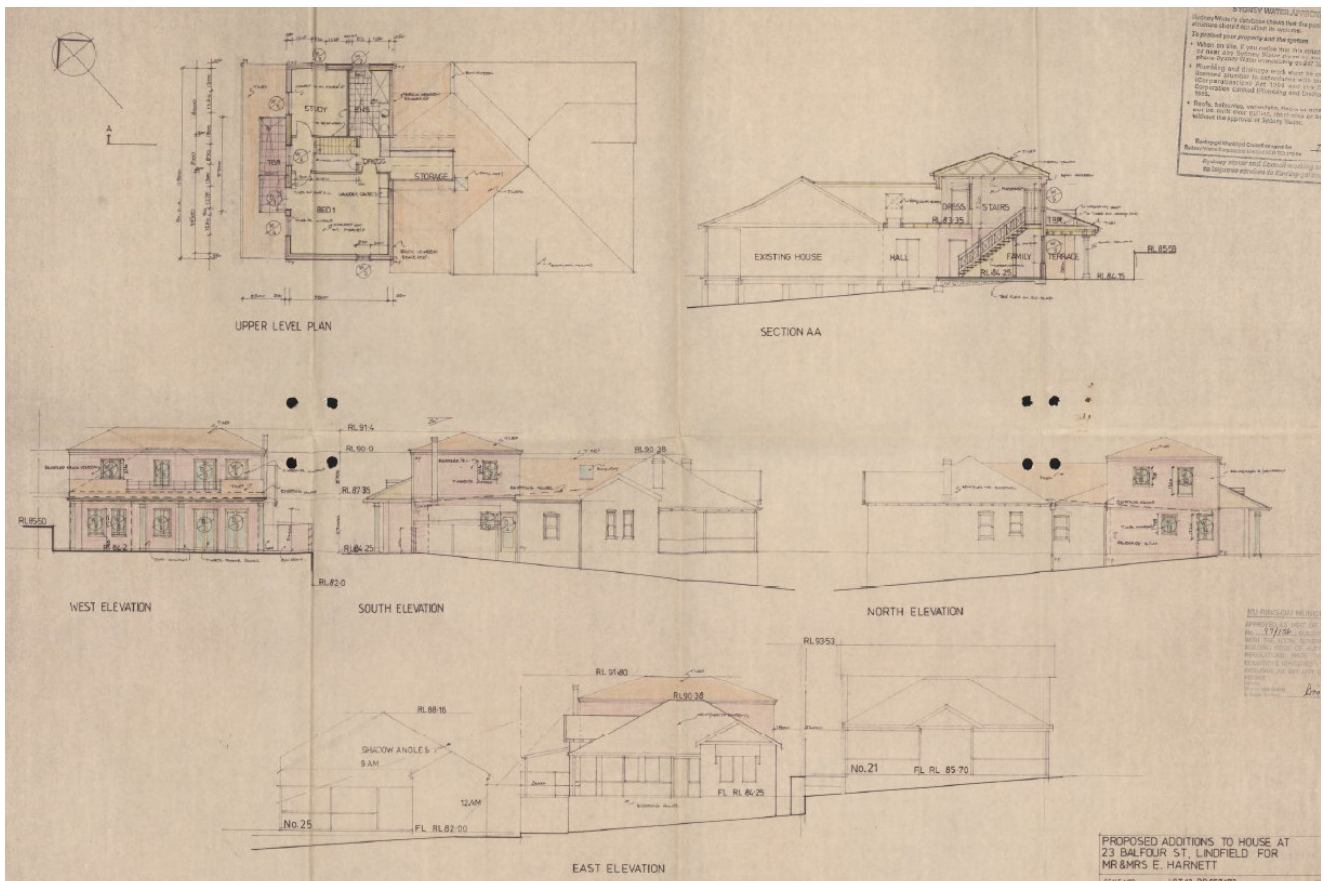


Figure 30
23 Balfour Street: the two-storey wing added in 1997 totally changed the rear part of the dwelling



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



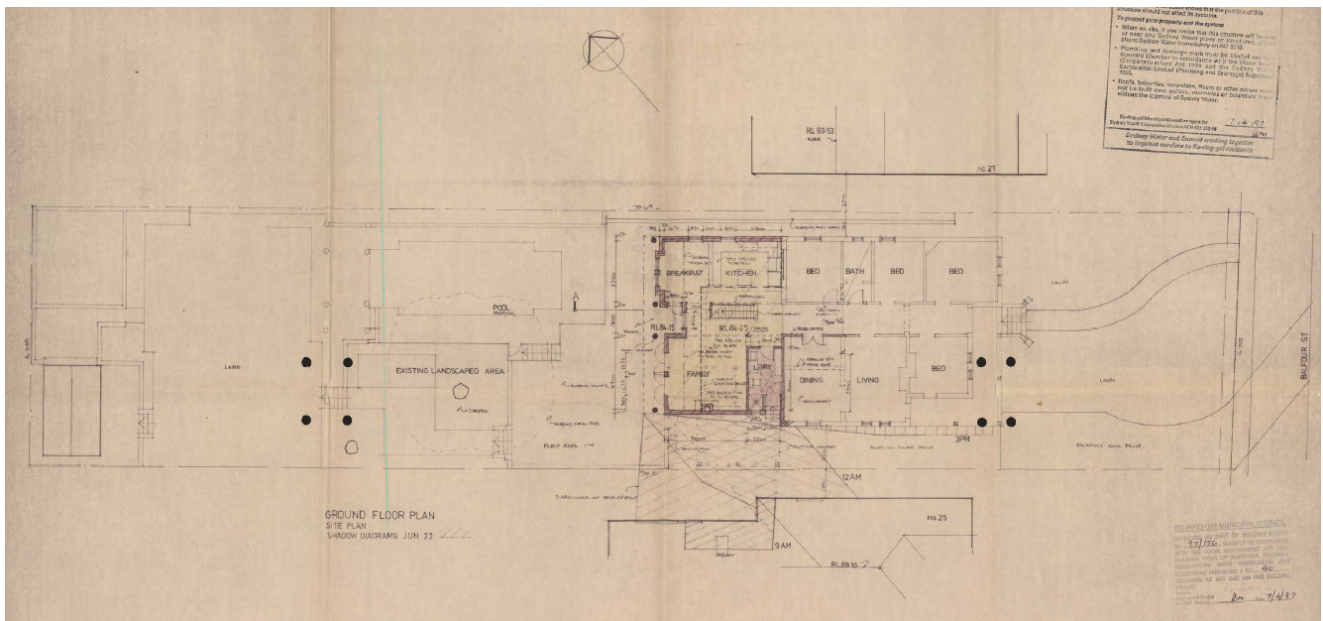


Figure 33
23 Balfour Street: 1997 two-storey rear addition, ground floor plan
Source: DA 156/97

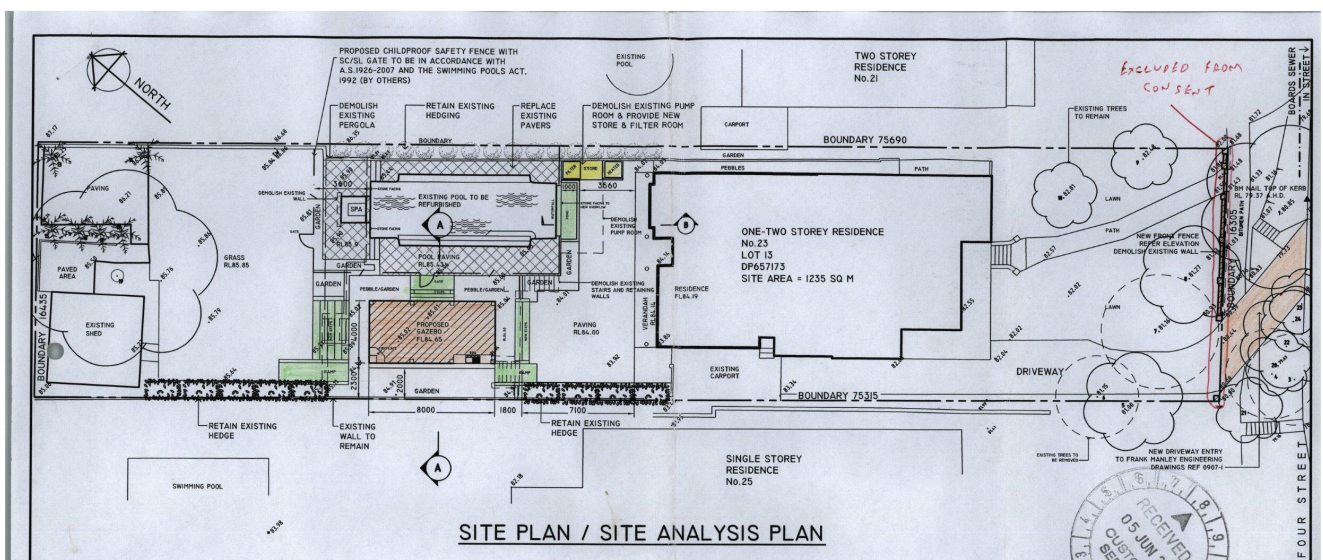


Figure 34
23 Balfour Street: rear garden works after second storey was added in 2009
Source: DA 327/09

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



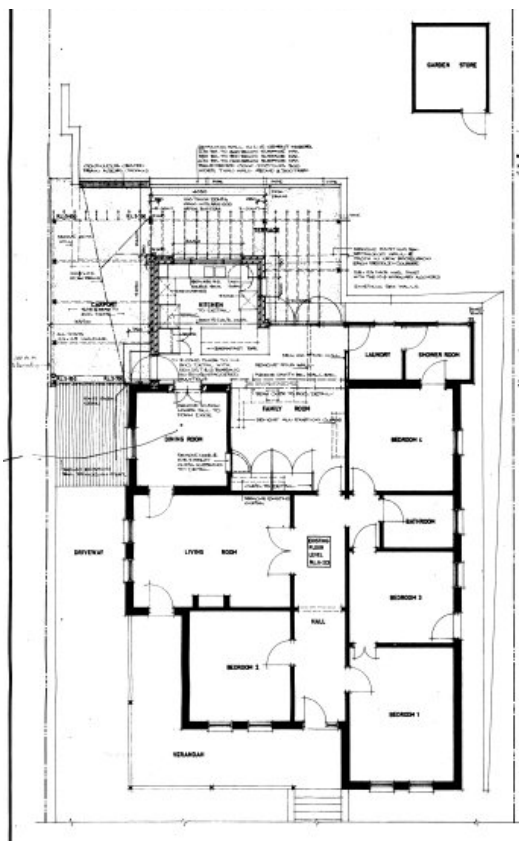


Figure 39 (above)
25 Balfour Street: 1974 rear additions and changes
Source: DA 1535/74

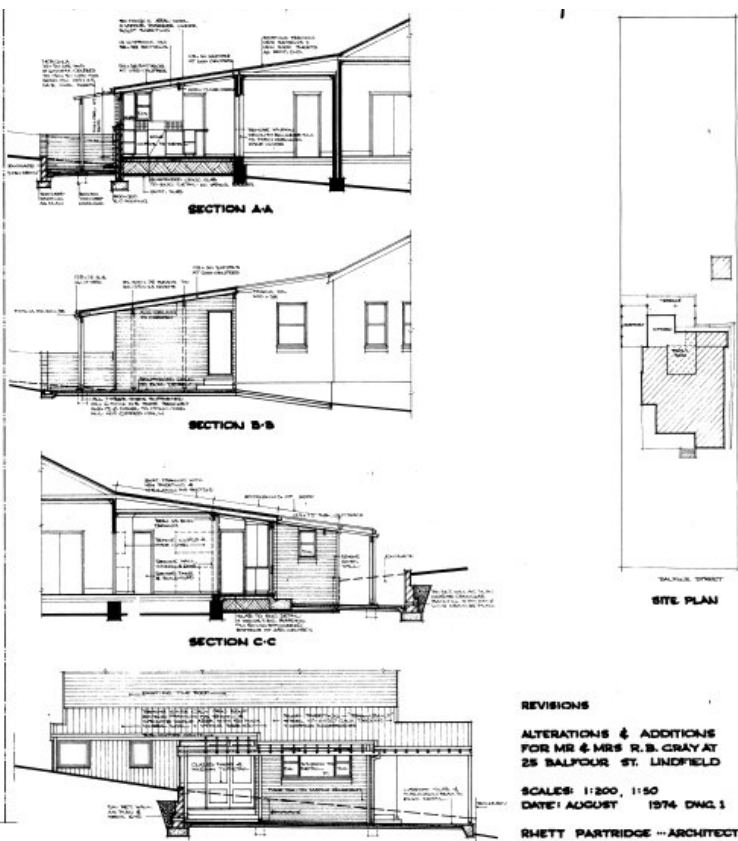
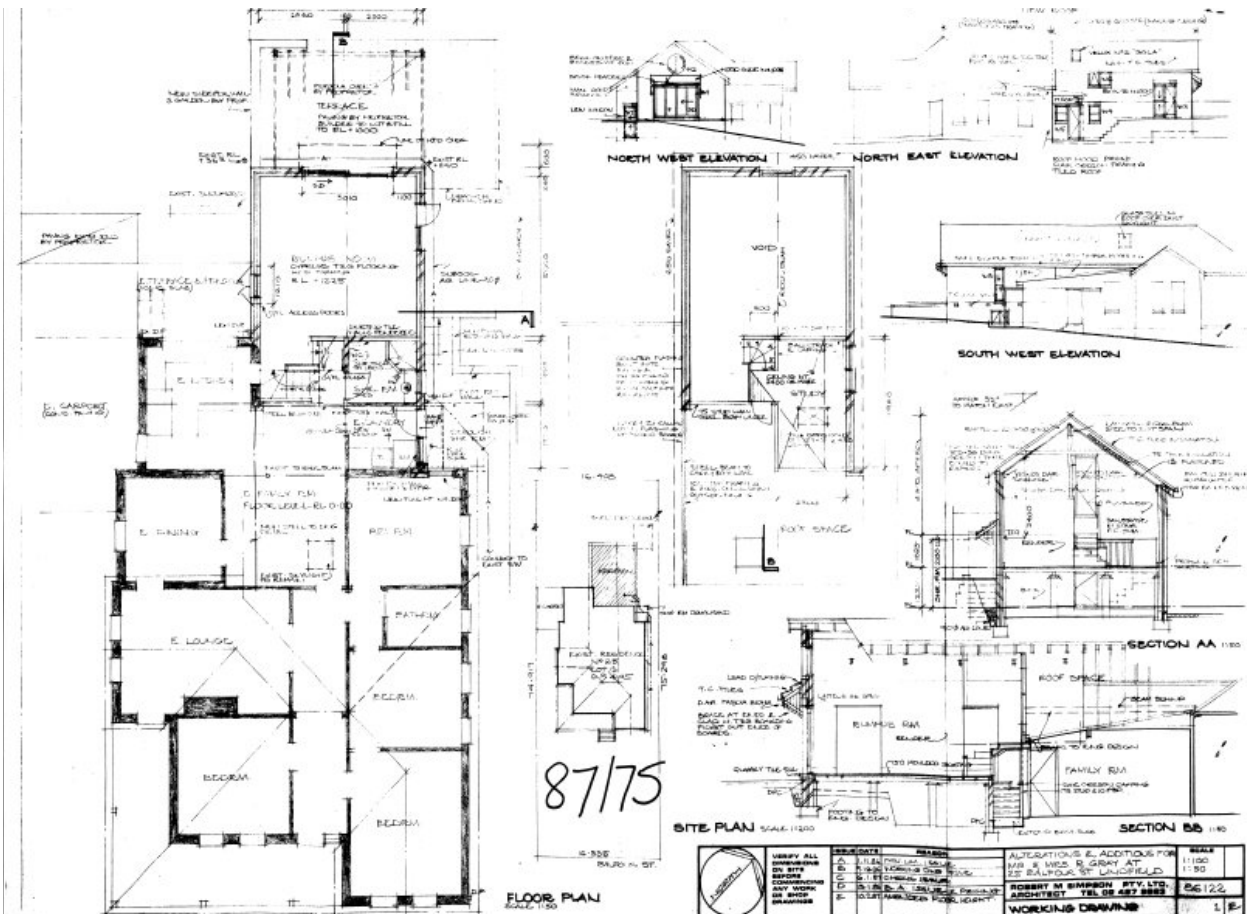


Figure 40 (below)
25 Balfour Street: 1987 rear additions and changes
Source: DA 75/87



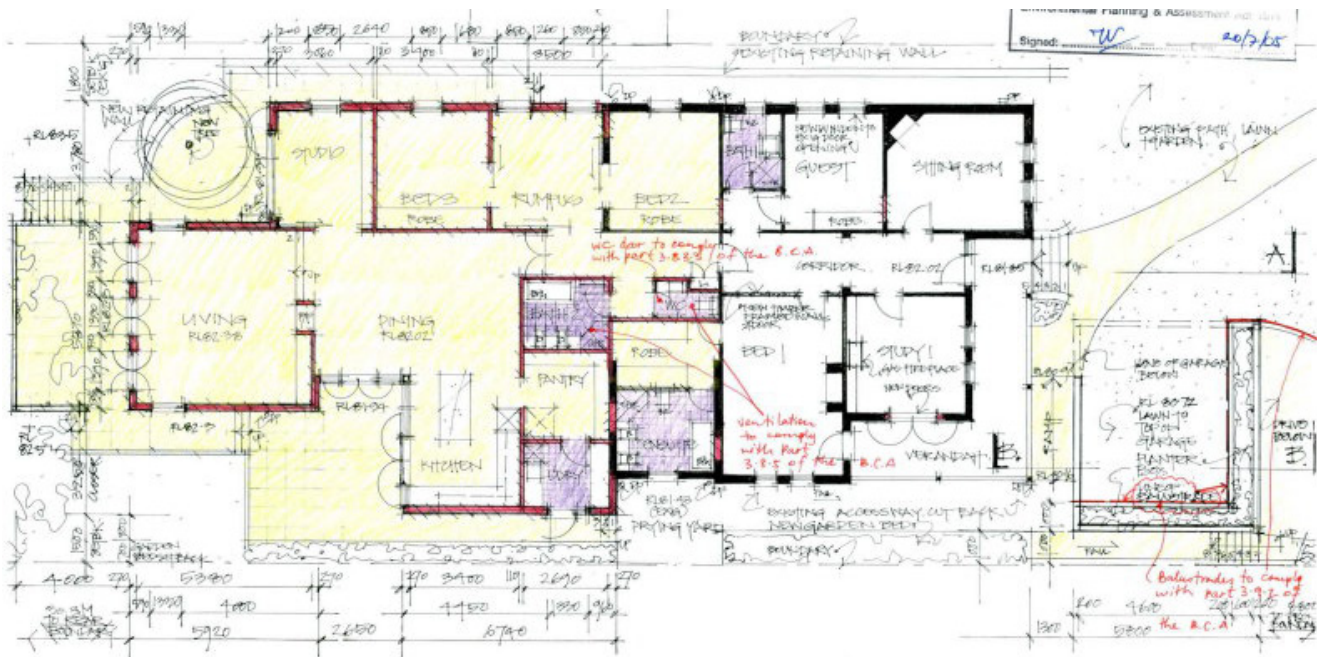


Figure 41
25 Balfour Street: 2006 major alterations and large rear wing.
Ground floor plan
Source: DA 1190/04



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

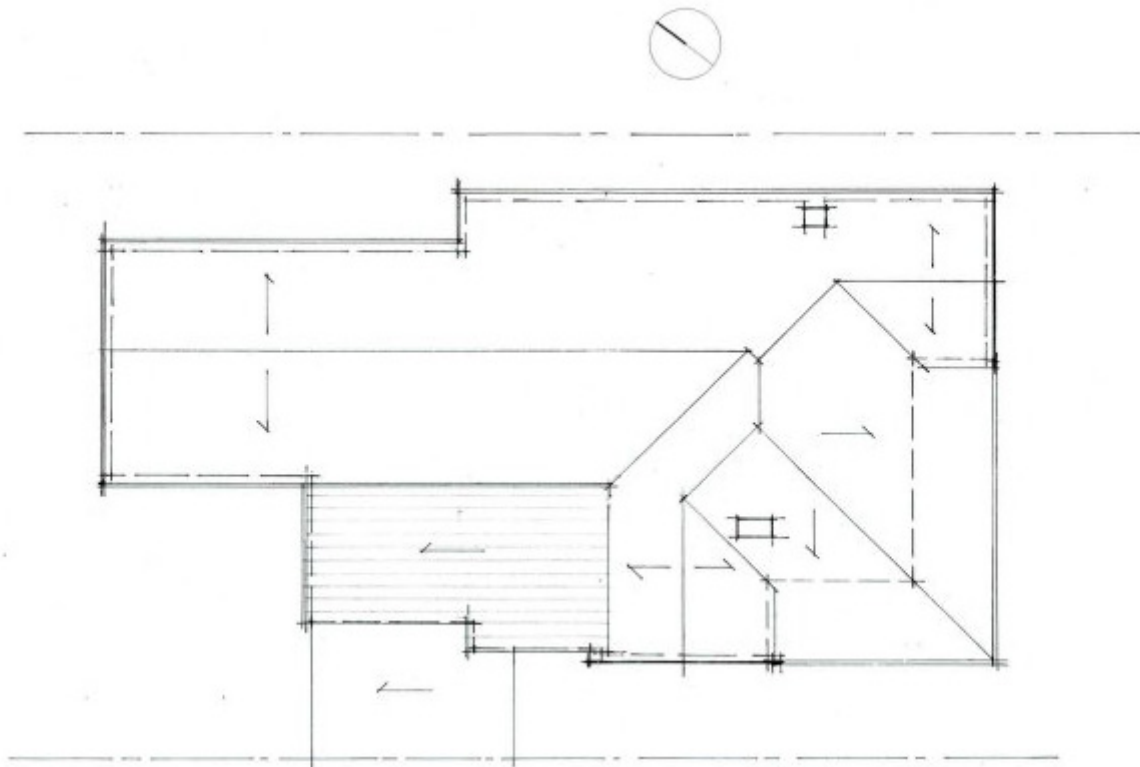


Figure 43
25 Balfour Street: pre-existing roof form to major alterations and large rear wing from 1987
Source: DA 1190/04

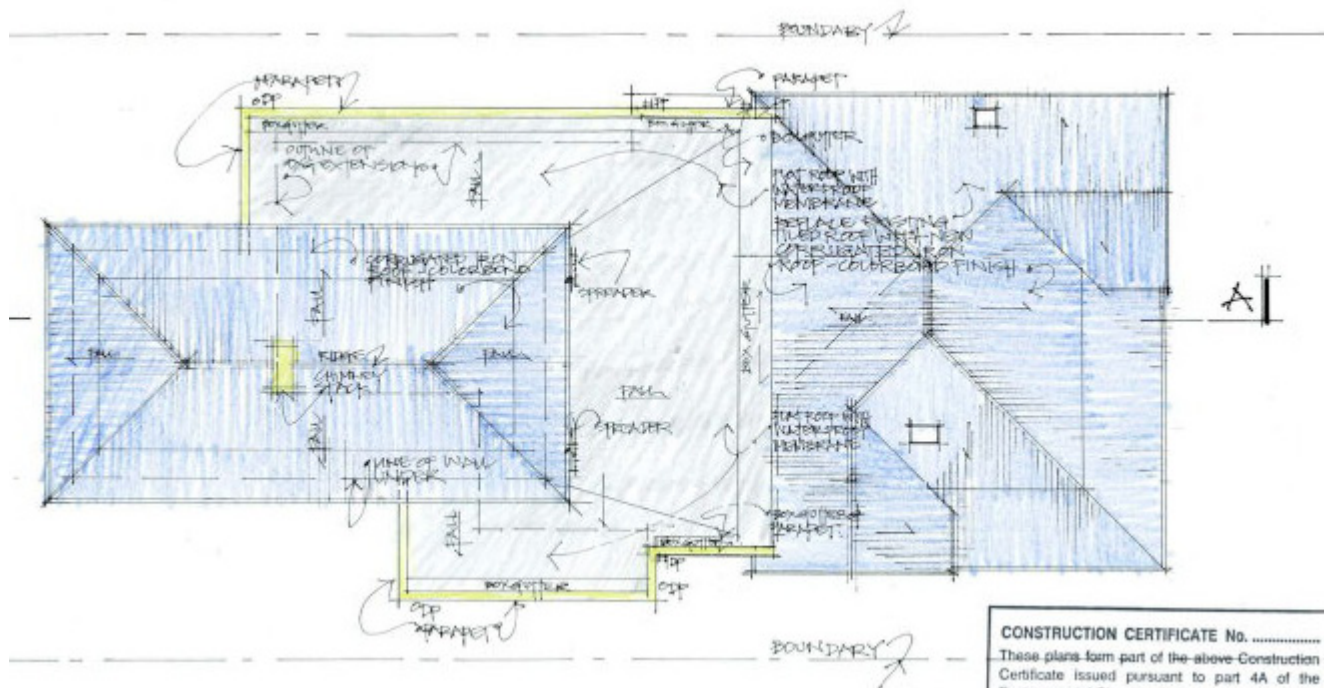


Figure 44
25 Balfour Street: 2005 major alterations and large rear wing new roof plan
Source: DA 1190/04

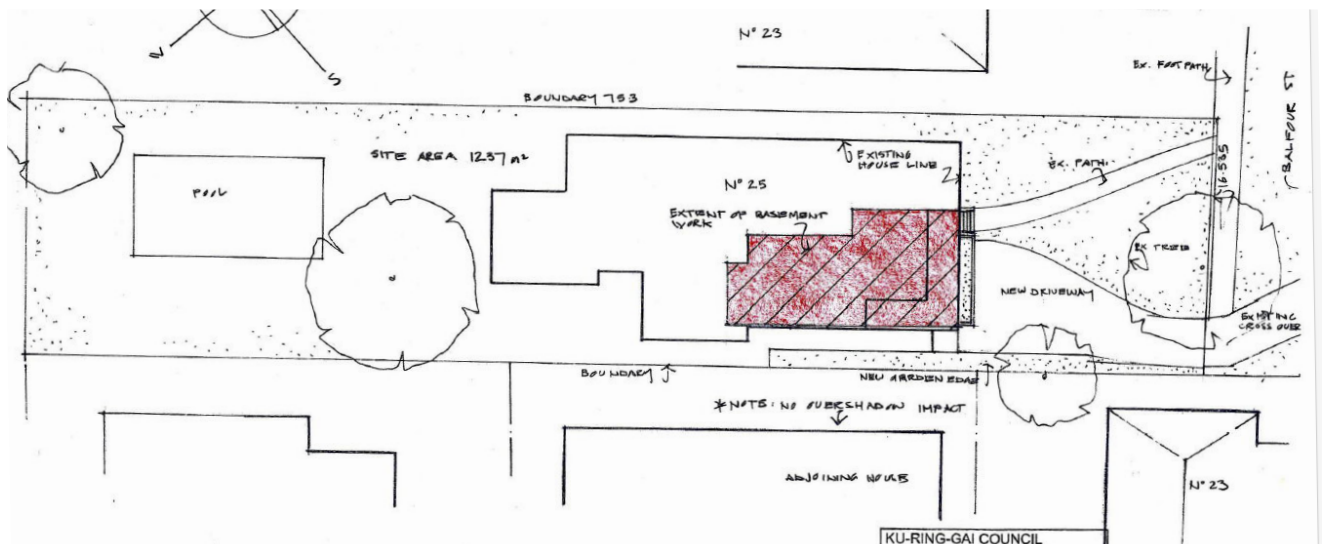


Figure 45
25 Balfour Street: the 2016 site plan of works includes the large rear addition erected in 2005
Source: DA 477/16

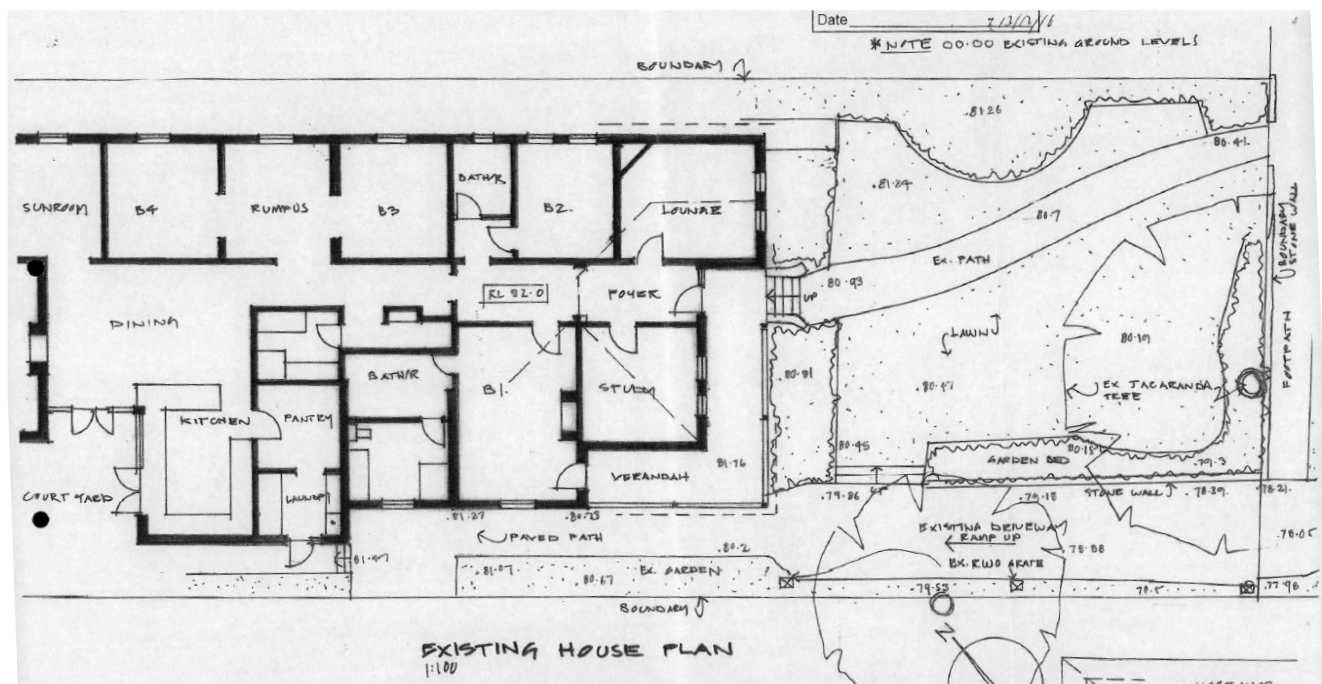


Figure 46
25 Balfour Street: 2016 new basement garage existing building plan
Source: DA 477/16

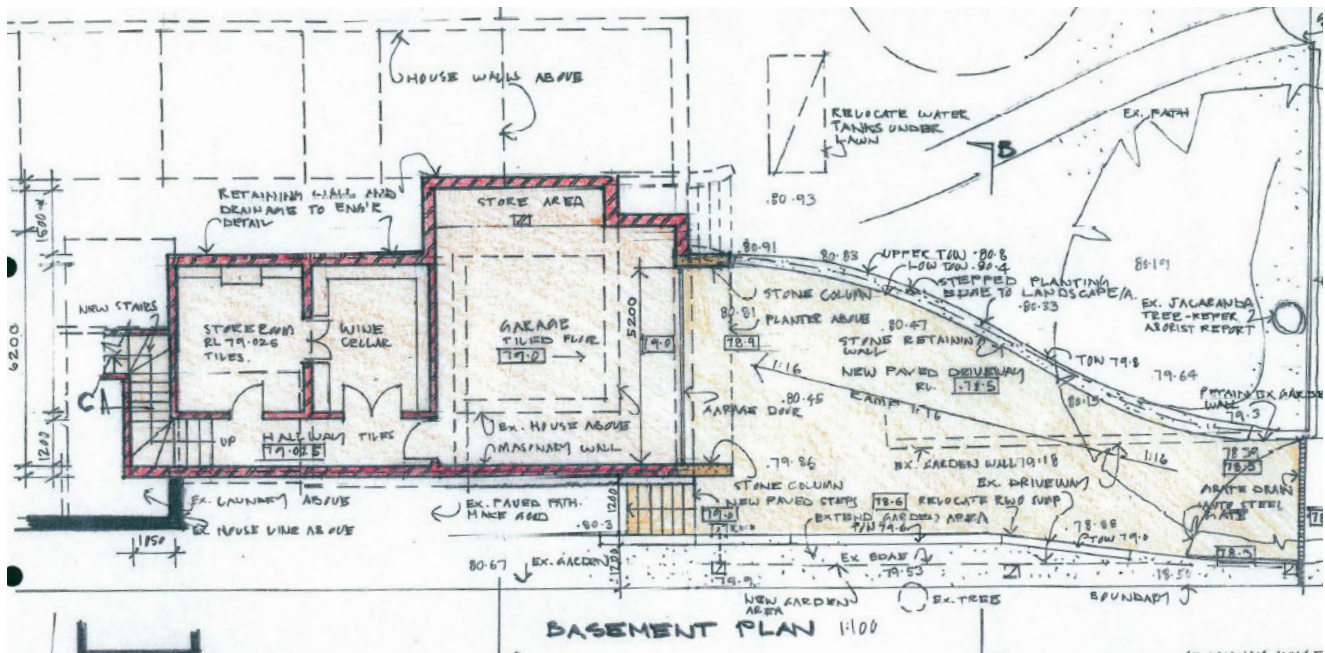


Figure 47
25 Balfour Street: 2016 plan showing the new basement garage and storerooms
Source: DA 477/16

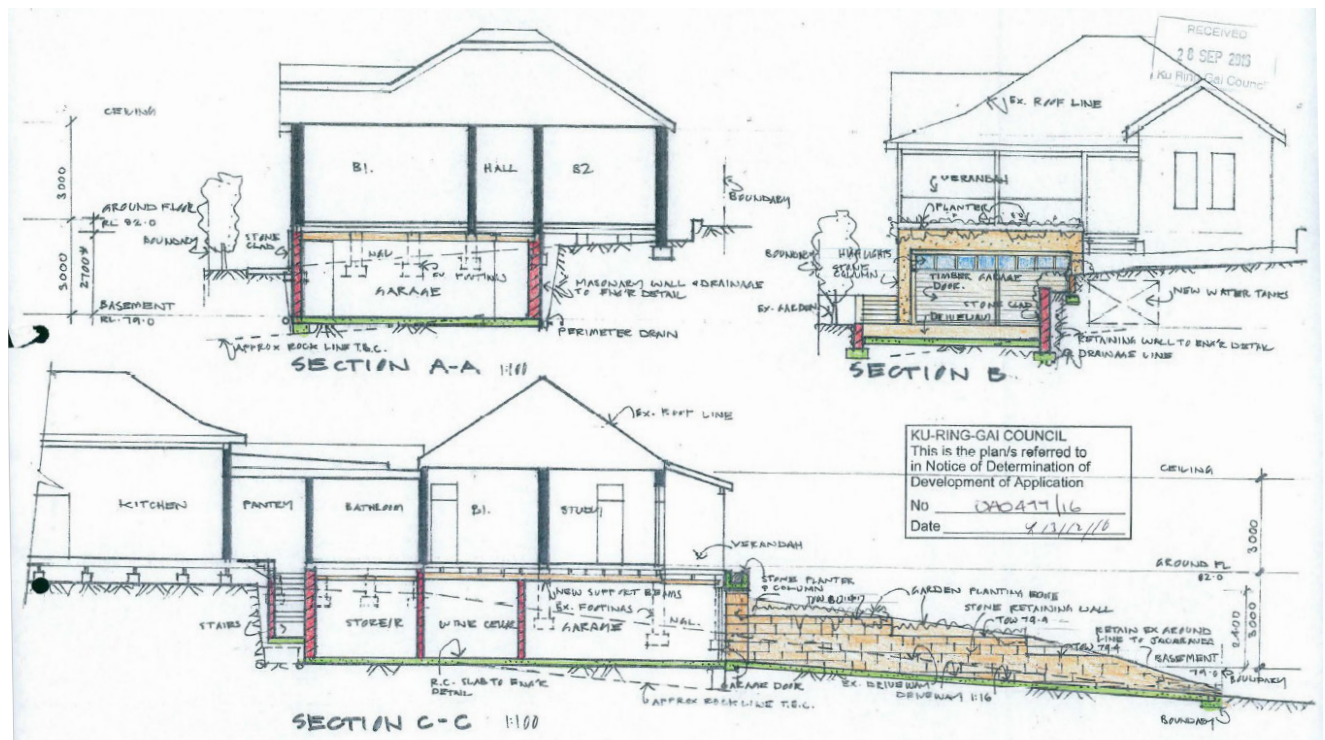


Figure 48
25 Balfour Street: new basement garage and storerooms sections and front elevation, 2016. Note Section CC includes a portion of the pre-2009 single storey rear addition
Source: DA 477/16

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.

SEPP (HOUSING) 2021

The NSW Planning Portal identifies the subject sites, 19-25 Balfour Street, Lindfield, as Transport Oriented Development (TOD) sites on the Transport Oriented Development Sites Map. As such, they may be developed under Chapter 5 *Transport oriented development* of the *SEPP (Housing) 2021*.

Under the TOD provisions of the 2021 SEPP, including the 30% affordable housing bonus, the maximum building height for the subject properties is 28.6 metres.

KU-RING-GAI LEP 2015

This report assesses the proposal against the heritage provisions of S5.10 of the *KLEP 2015*.

Ku-ring-gai Council has prepared a proposal to change the *KLEP 2015* which would allow for higher density development around the train stations identified in the TOD scheme. The proposal is outlined in the document *Preferred Scenario Exhibition Document*, dated 4 April 2025. In relation to the subject site, the exhibition document proposes:

- Extinguishment of the TOD scheme provisions;
- Extinguishment of the Balfour Street / Highfield Road Conservation Area;
- Rezoning the subject properties to R4 - High Density Residential;
- Changing the maximum building height level to 29m;
- Changing the Floor Space Ratio to 1.8:1; and
- Availability of an affordable housing bonus of 5%.

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 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 8.178m 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 proposed development, at the western end, exceeds the maximum building height, providing for a non-compliant maximum building height of 32.7 metres. The proposed landscaping is designed by Studio IZ Pty Ltd.



Figure 49
CGI render showing the proposed development
Source: Giles Tribe

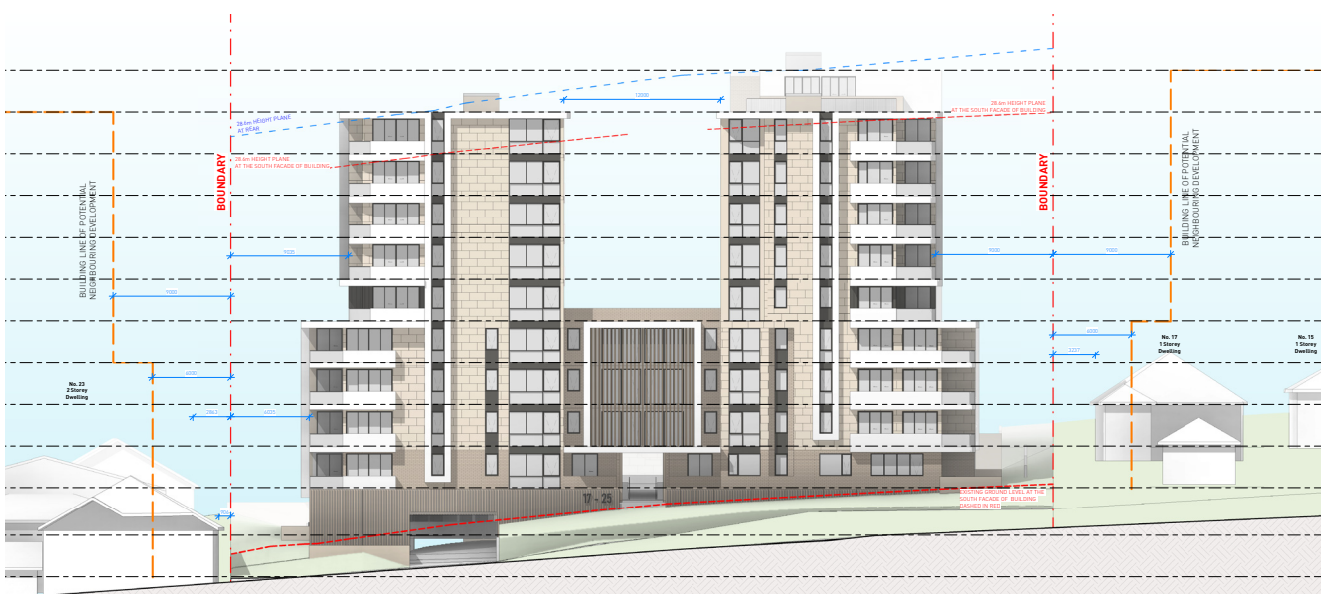


Figure 50
South elevation drawing of the proposed development
Source: Giles Tribe

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.
- 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.
- The proposal from Ku-ring-gai Council to extinguish the Balfour Street / Highfield Road Conservation Area as part of a change to the *KLEP 2015*, as detailed in the *2025 Preferred Scenario Exhibition Document*, demonstrates that Council has possibly concluded that redevelopment of the subject and surrounding properties will have an acceptable heritage impact.
- Other properties within the Balfour Street / Highfield Road Conservation Area, including contributory buildings, may be redeveloped under the TOD scheme and under the proposed Ku-ring-gai Council scheme. 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, 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. The proposal will not negatively impact the heritage values of the conservation in its likely future form.
- The lower floors of the front (south) elevation features brick and timber batten walls, 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 proposed future change to the *KLEP 2015*.

- In terms of *The Apartment Design Guide (2015)*:
 - Heritage items in the vicinity: The subject properties are located across Bent Street from the heritage item at 28 Bent Street (I416). The subject properties are separated by the heritage item at 6 Highfield Road by intervening development. The proposed development will not affect views of the nearby heritage items. The proposal will have a minor and acceptable impact on the setting of heritage items in the vicinity.
 - Building height: While the proposed building will impact on the setting of houses within the Balfour Street / Highfield Road Conservation Area, under the State government's TOD legislation, the redevelopment of properties within the conservation area with multi-storey apartment buildings will have an inevitable impact.
 - Floor Space Ratio: While the proposed bulk and scale generated by the floor space ratio will negatively impact the setting of other properties within the Balfour Street / Highfield Road Conservation Area, the State government has determined that the redevelopment of the subject properties with an apartment building with a floor space ratio that allows for multi-storey development will have an inevitable heritage impact.

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*. DPHI should approve the proposed development.

Yours faithfully,
GBA Heritage Pty Ltd



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