

Project Number: HN001294-B



STATEMENT OF HERITAGE IMPACT – 241-245 PENNANT HILLS ROAD, CARLINGFORD

FINAL 17 / 09 / 2025

REPORT TO: TRIPLE EIGHT CORPORATION PTY LTD ATF THE
CARLINGFORD UNIT TRUST
241-245 Pennant Hills Road, Carlingford, NSW 2118

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Declaration

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The undersigned declares that this Aboriginal heritage due diligence assessment has been prepared in response to the following SEARs requirements issued for the Project on 23/05/2025 for SSD-84699461:

SEARs item no.	SEARs Requirement	Relevant Section of this Report
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.	Sections 4-5

Signed



Dated 17/09/2025

Cover Page

Name of the heritage item:	N/A
State Heritage Register / LEP heritage schedule item number and name:	N/A
Address and location:	241-245 Pennant Hills Road, Carlingford NSW 2118
Statement of heritage impact for:	Redevelopment of commercial premises
Prepared by:	Dr Holly Winter BA (Hons), PhD Senior Heritage Consultant, Heritage Now holly.winter@heritagenow.com.au
Prepared for:	Triple Eight Corporation Pty Ltd atf The Carlingford Unit Trust c/o- Nigel White, Planning Direction Pty Ltd
Date:	17/09/2025
Issue:	Final

Executive Summary

Heritage Now Pty Ltd was engaged by Triple Eight Corporation Pty Ltd on behalf of The Carlingford Unit Trust to prepare a Statement of Heritage Impact as part of a State Significant Development application for a mixed-use development at Carlingford. The Project Area is located at 241-245 Pennant Hills Road, Carlingford and consists of a mixed-use commercial premises.

Historically, the Project Area falls within the boundaries of the early land grant of Portion 106 of the Parish of Field of Mars, and indicates the Project Area was located within hilly country near areas used for timber getting, occupying a small portion of land in the north-western corner of Michael Fitzgerald's grant. By the 1830s, much of the economy in the area was based on horticulture or mixed agriculture benefitting from earlier land clearing from timber getting. From the parish maps in the late 19th century and early 20th century, there were no structures present on the site at this time. By 1955 there are some minor changes within the Project Area, and increasing development in the surrounding area. The K13 Memorial on the opposite side of Pennant Hills Road had been completed by 1961. By 1965 the earlier buildings within the Project Area were demolished and a larger complex, with the same footprint as the buildings on the site today, was constructed. No archaeological constraints have been identified as a result of the historical review.

The Project Area is not listed on any statutory heritage lists or registers, and it does not contain any elements with built heritage significance. All structures within the Project Area date to the mid to late 20th century. However, there are two local heritage items in the vicinity (within 200m):

- K13 Memorial - 304 Pennant Hills Road, Dundas NSW 2117 (LEP #I038)
- Carlingford Stock Feeds - 1 Thallon Street, Carlingford NSW 2118 (LEP #I042).

The proposed redevelopment will result in no impacts to heritage items in the vicinity of the Project Area. Individually listed heritage items are separated physically from the Project Area: 'K13 Memorial' by Pennant Hills Road, and the 'Carlingford Stock Feeds' by Pennant Hills and Jenkins Roads and a service station at the corner of these roads. Views to and from the Carlingford Stock Feeds are screened by remnant buildings, roads and vegetation located around the northern, eastern and southern boundaries of the Project Area.

The K13 Memorial is meant to be viewed facing the south, away from the Project Area, across the Dundas Valley. The staircase leading down from Pennant Hills Road to the memorial also directs the view, like a theatre. The surrounding views of the memorial are already impacted by a multi-storey residential building to the west, although the other directional views are not affected. Despite the proposed multi-storey development of the Project Area, the works and proposed building will not directly impact the immediate views of the heritage item.

No heritage impacts have been identified as part of this Statement of Heritage Impact and the following recommendations can be made for the Project Area:

Recommendation 1

The State Significant Development of the Project Area will have no impact on the significance of heritage items in the vicinity of the Project Area. For this reason, there are no identified historic (European) heritage/archaeological constraints to the redevelopment works of the Project Area.

Recommendation 2

A heritage induction is to be provided to all on-site personnel undertaking construction works so that they understand their obligations for protecting heritage under the *Heritage Act 1977*. This includes protection of built heritage and historical archaeological sites and the reporting of any new or suspected heritage site/s. This may be done through an on-site induction or other suitable format.

Recommendation 3

In the unlikely event archaeological, or suspected archaeological material is uncovered during works, then works in that area are to cease and the area is to be cordoned off. The material is to be inspected by a heritage consultant and works in that area are only to recommence once heritage clearance has been gained and/or mitigation and management measures implemented.

Recommendation 4

In the unlikely event that human remains, or suspected human remains are uncovered during the development, then works in that area are to stop and the area is to be cordoned off. The project manager is to contact the NSW Police to establish whether the area is a crime scene. If it is not a crime scene, then Heritage NSW will be consulted. The ideal conservation outcome is to leave the human remains undisturbed, however, if this is not possible then an appropriate approval will be sought from Heritage NSW.

Acronyms, Terms and Definitions

Acronym/Term	Definition
DP	Deposited Plan
HLRV	Historical Lands Record Viewer
LEP	Local Environmental Plan
LGA	Local Government Area
m	Metric metres
Project Area	Project Area
SCP	Spatial Collaboration Portal for NSW spatial datasets by DCS Spatial Services
SHI	State Heritage Inventory
SLNSW	State Library of New South Wales
SoHI	Statement of Heritage Impact
SSD	State Significant Development

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1 The Project Area

Heritage Now Pty Ltd (Heritage Now) was engaged by Triple Eight Corporation Pty Ltd on behalf of The Carlingford Unit Trust to prepare a Statement of Heritage Impact (SoHI) as part of a State Significant Development (SSD) application for a mixed-use development at Carlingford.

1.1 Site Description

The Project Area (Project Area) is located at 241-245 Pennant Hills Road, Carlingford (Lots 1, 2, 5, 6, DP805059) (Figure 1). It lies within the City of Parramatta Local Government Area, approximately 5km north-east of the central area of Parramatta (Figure 2). The Project Area is bounded by Felton Road to the north, Pennant Hills Road to the south and east, and residential properties along the western lot boundary.

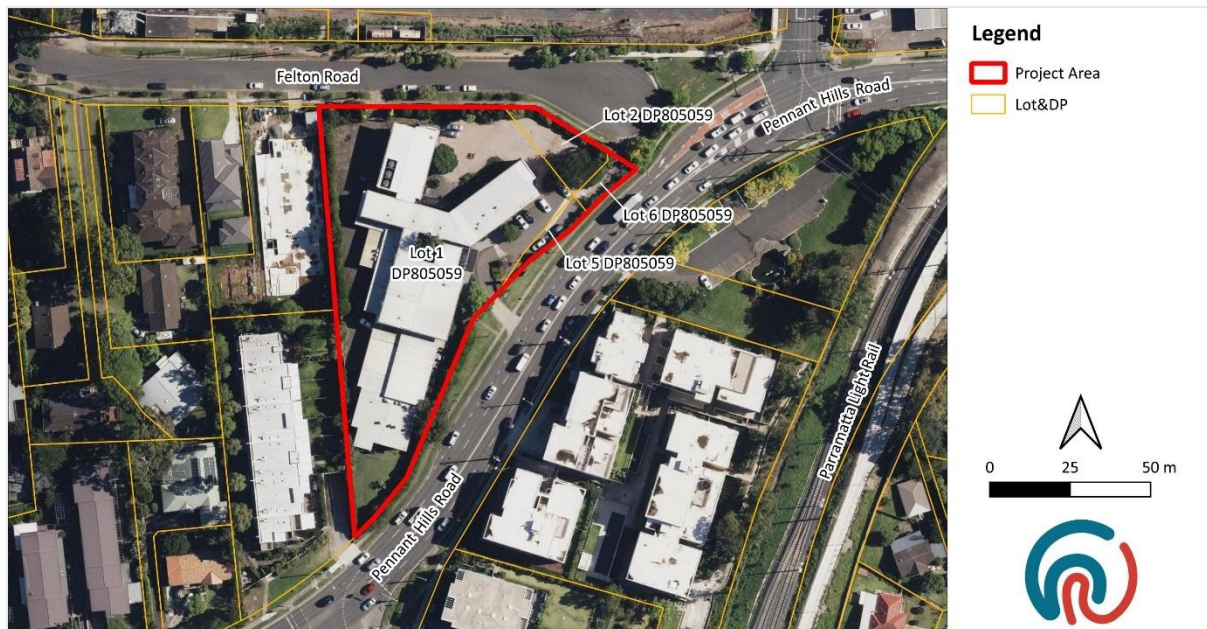


Figure 1. Project Area. (Source: SCP with Heritage Now additions)

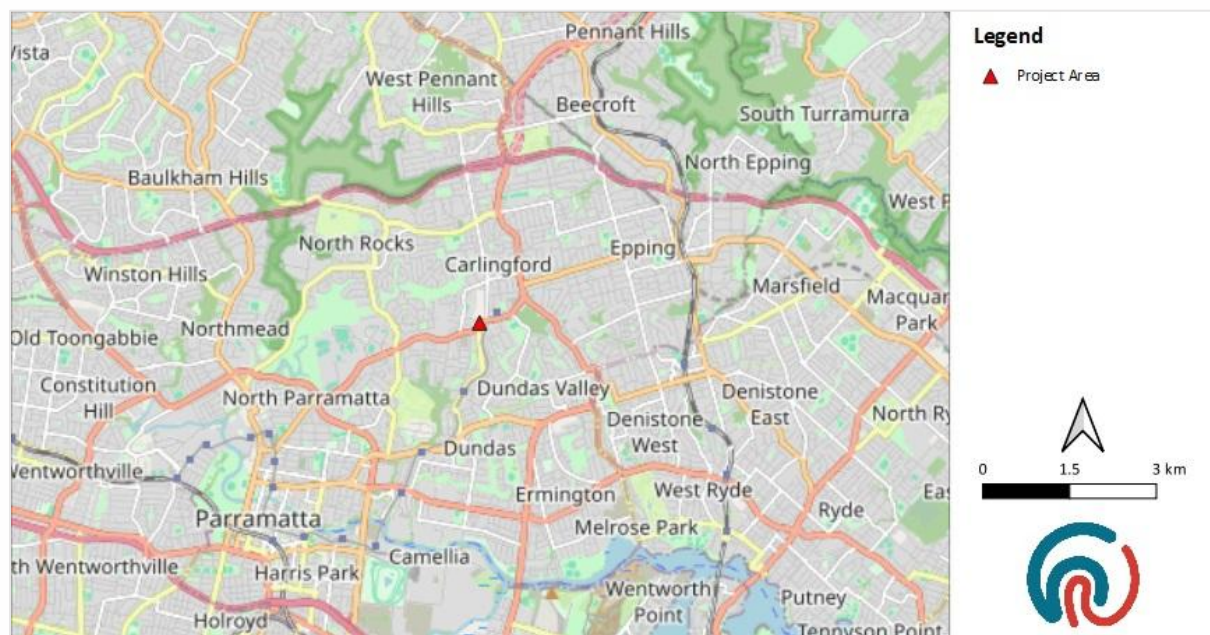


Figure 2. The Project Area in a regional context. (Source: SCP with Heritage Now additions)

1.1.1 Heritage Item

The Project Area is not listed as a heritage item on any statutory heritage lists or registers.

1.1.2 Heritage Listings

All relevant historic heritage registers were searched, and no specific heritage listings were found for the Project Area. A search for listed heritage items within 200m of the Project Area identified two items of local heritage significance included in the Parramatta LEP 2023 (Table 1, Figure 13). These items are discussed further in Section 2.

Table 1. Heritage listing search results within or near the Project Area

Listing type	Item name and document details	Listing number	Distance from Project Area
Local heritage item	K13 Memorial Parramatta Local Environmental Plan 2023	I038	c.50m east
	Carlingford Stock Feeds Parramatta Local Environmental Plan 2023	I042	c.200m north-east

1.1.3 Site and Its Context

The roughly triangular lot currently contains mixed commercial premises in a mid- to late-20th century one- to two-storey building complex, with on-site car parking areas. The Project Area is currently zoned 'E1 Local Centre' in the Parramatta Local Environmental Plan 2023 (Parramatta LEP), with medium (R3) and high density (R4) residential zones to the west, south and east. Carlingford Substation is north of the Project Area on the opposite side of Felton Road, and a public park is located to the east, on the opposite side of Pennant Hills Road.

1.1.4 The Proposed Works Area

The proposed development will demolish the existing mid- to late-20th century commercial premises at the site and construct a new mixed-use development (Figure 3), which includes a 14-storey tower building (17 storeys if approved for the 30% bonus volume from the NSW Affordable Housing Bonus) in the eastern half of the site, and residential housing and commercial premises along the western side of the Project Area, with a three storey basement across the whole site.



Figure 3. Proposed New Building Plan. (Source: Kennedy Associates Architects, May 2025, 1804-SD0091)

1.2 Historical Context

Before 1788, the area now known as Carlingford was occupied by the Wallumedegal people and contact with Europeans was made soon after the arrival of the First Fleet.¹ Carlingford lies within the Parish of Field of Mars in the County of Cumberland, but has been known by various locality names and incorporated into several different municipal areas since European settlement. The first land grants in the area were made by Governor Phillip in 1792 to five Ticket of Leave convicts in what was then known as Northern Boundary, a name describing lands around North Parramatta extending from Windsor Road to Pennant Hills Road.²

An undated parish map showing the boundaries of early land grants in the Parish of Field of Mars indicates that the Project Area was located within hilly country near areas used for timber getting, occupying a small portion of land in the north-western corner of Michael Fitzgerald's grant (Figure 4). Fitzgerald's land consisted of two grants made in April 1794 (30 acres) and September 1796 (80 acres), that were consolidated into one larger holding (Portion 106). This part of Fitzgerald's property shared boundaries with grants to other former convicts, Benjamin Carver to the west and Richard Partridge to the north, and is separated from the larger part of his land by the alignment of Pennant Hills Road (Figure 5). Multiple grants border Fitzgerald's holdings to the east and south; most notable among these are William Mobbs, after whom the area near the junction of Pennant Hills Road and Marsden Road was named. No additional historical information regarding Fitzgerald is known.³

Initially Pennant Hills Road would have been little more than a track from Parramatta to the Northern Boundary settlements, and although slightly offset from its modern alignment, the road ran parallel to this. The road connected North Parramatta with Pennant Hills via Mobbs Hills where it intersects with Marsden Road. The slightly irregular alignment of Pennant Hills Road is likely the result of following the topography indicated on the early undated Parish of Field of Mars plan, rather than grant boundaries (Figure 4). Confusingly, an earlier road from Ermington wharf on the Parramatta River, running north to timber getting areas in Pennant Hills, was also known by the name Pennant Hills Road; it is now known as Wharf Road and Marsden Road.⁴ By 1825, the ridge along which Pennant Hills Road ran had been fully divided for the allocation of land grants.⁵ The road remained the main route to Carlingford throughout the 19th century, effectively dividing the Project Area from the larger part of Michael Fitzgerald's original grant.

Other early land holders in the area came as free settlers and contributed to the mix of occupants, agricultural holdings and larger houses built for wealthier residents throughout the 19th century. By the 1830s, much of the economy in the area was based on horticulture or mixed agriculture benefitting from earlier land clearing from timber getting. Convict settlers such as William Mobbs established successful orchards based around citrus or stone fruit production, allowing them to acquire property or wealth to pass on to their descendants.⁶ Some moved into more prominent roles in government or the community, such as Frederick Charles Cox, the son of a former convict who

¹ McHardy and Tsang 2019.

² Kass, Liston, and McClymont 1996:34; Trimmer 2006:3.

³ Trimmer 2006:94, 131.

⁴ Trimmer 2006:1.

⁵ Kass et al. 1996:119.

⁶ Kass et al. 1996:124, 228; McHardy and Tsang 2019.

was born in Parramatta in 1838. Cox was a long-serving alderman and Mayor of Dundas Council, who also served on Parramatta Council. His orchard business was highly successful, allowing him to build a large family home (Blenheim) on land bought from Richard Partridge, where the Carlingford substation immediately north of the Project Area now stands.⁷

Calls for an extension of the railway line as far as Dural were made to the Minister for Public Works throughout the 1880s, at the instigation of local fruit growers.⁸ The deputations were unsuccessful, but two separate private lines were built in the area, branching off the main line from Clyde. The first line to Rosehill opened in 1888, and a second private line from Rosehill to Carlingford (originally known as Pennant Hills station) opened in April 1896. The railway line also ran through the western side of Michael Fitzgerald's grant (Figure 5). The private lines proved financially unviable, and services stopped at the end of 1896. The Government eventually purchased both from the receivers and recommenced services again in 1901, renaming the station from Pennant Hills to Carlingford. A new goods siding and a large storehouse were built to receive produce from the local area, as well as a run-around loop for locomotives. The line was electrified as far as Carlingford by 1959, and a siding to move large equipment into the adjacent substation was built. Both the loop and sidings have been removed and the railway line to Carlingford ceased operating in January 2020, for conversion to light rail.⁹

In 1922, a producer's co-operative was formed by local poultry farmers, to buy produce direct from other producers and supply agricultural needs. As the business grew, the co-operative needed larger premises, and leased the new storehouse at Carlingford station to store feed and process grain on-site, taking advantage of the railway and goods siding infrastructure (Figure 6).¹⁰ A produce store continued to operate on the site until it ceased trading in February 2021, but buildings and equipment from the local heritage listed produce store remain.

As well as continuing to move produce out of the area to Parramatta and Sydney markets, the railway also provided greater public transport to Carlingford and the impetus for subdivision. Early residential subdivisions focussed on land around railway stations but were slow to take off in the Carlingford area. The Tomah Estate to the east of the station and Marsden Road was offered for sale in 1909, listing residential blocks and orchard sites. Sales closer to Carlingford station were advertised in 1915, but development in the area was slow through the early part of the 20th century.¹¹ There is little detail about the transfer of Fitzgerald's grant containing the Project Area; however, sections of the original grant appear to have been subdivided by 1910, as shown on a parish map with the formation of Coleman Avenue and Honiton Avenue West and East (Figure 7). These lots were offered for sale in 1917 as the Honiton Estate, noted to be the property of Mr William C Cox, showing that parts of the grant had already changed hands (Figure 8).¹² Although the Project Area is not included, the map shows it more clearly bounded by Felton Street to the north and with a trigonometric station point (TS R¹⁵) on Pennant Hills Road. An entry in *Wise's New South*

⁷ McHardy and Tsang 2019; Trimmer 2006:102-4.

⁸ Kass et al. 1996:242; Trimmer 2006:112.

⁹ Transport for NSW, 2019; Sahni, 2019.

¹⁰ Trimmer, 2006:113-4.

¹¹ Kass et al. 1996:279; see auction plan: 'Carlingford Station Estate', SLNSW 001-p/10/1-1a.

¹² See auction plan 'Carlingford Honiton Estate - Pennant Hills Rd, Jenkins Rd, Coleman Ave', 1917, SLNSW 022 - Z/SP/C10/22.

Wales Post Office Directory for Carlingford in 1922 lists 'Cox Fredk C, JP, orchdst' on the left side of Pennant Hills Road before the railway station, but it is unclear if this includes the Project Area; it may have been part of Cox's holding or unoccupied.¹³

The K13 Submarine Memorial opposite the Project Area was established in 1961, following the death of Mr Charles Albert Freestone, a local resident of Carlingford on a property known as Greenacres. Freestone had survived the accident in 1917 during testing of the K13, when a safety gauge used to check the closure of ventilators to the boilers before diving was dismissed as faulty. The resulting accident caused parts of the submarine to flood, killing almost half of the crew of 80 sailors. After moving to Australia, Freestone had gone on to serve in the Royal Australian Navy, and the memorial was also dedicated to all submarine crews who lost their lives between 1914 and 1955. As part of his bequest, Mr Freestone stipulated that part of his land be used to house the memorial that is located opposite the Project Area.¹⁴

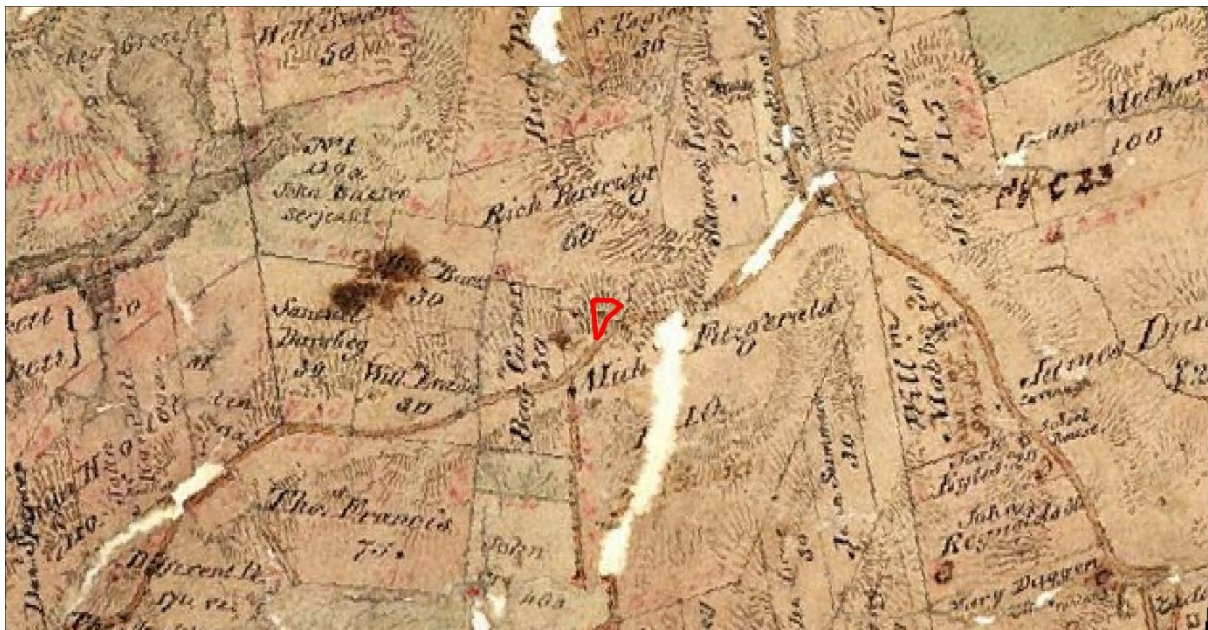


Figure 4. Early Parish of Field of Mars map showing general location of Project Area. (Source: NSW HLRV, 140759)

¹³ *Wise's New South Wales Post Office Directory* 1922:232.

¹⁴ Trimmer 2006:10.

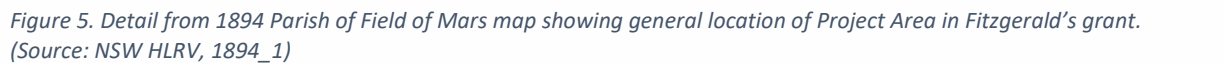




Figure 7. Detail from Parish of Field of Mars map 1910 showing the location of the Project Area. (Source: NSW HLRV, 14084)

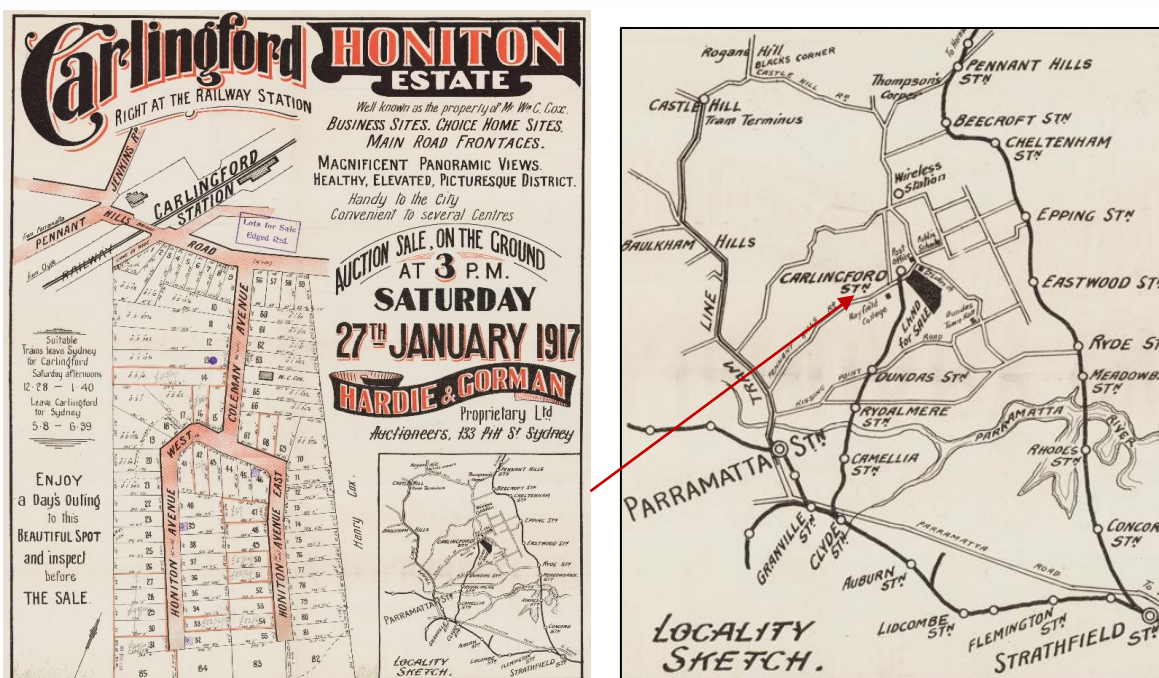


Figure 8. 1917 subdivision auction plan pointing to approximate location of Pain locality sketch. (Source: SLNSW, 022 – Z/AP/C10/22)

The use of available historical aerial imagery provides another source to understand changes made to the landscape, buildings or other features in the Project Area during the 20th century, and how this might affect any heritage significance or archaeological potential for the site. The earliest available historical aerial imagery dates from 1943 and shows the Project Area surrounded by mainly cleared agricultural land, with limited housing development. There are several small buildings and

landscaping on the allotment, consisting of a rectangular building fronting Felton Road with smaller associated structures, a building complex in the centre of the lot, with a large landscaped circular feature with a cleared area; possibly a circular drive for access from Pennant Hills Road (Figure 9). The north-eastern part of the lot is completely cleared but the western portion, particularly near the central building, has tree cover.

By 1955, there are some minor changes within the Project Area and increasing development in the surrounding area. The circular feature is no longer visible and looks to have been replaced by a linear entrance driveway from Pennant Hills Road to the central building, before turning towards the rectangular building on Felton Road (Figure 10). Small trees and shrubby vegetation along the western perimeter have been cleared, and only the larger plantings near the central building remain. Historical sources suggest the linear features and buildings on the opposite northern side of Felton Road relate to a flower farm, as that allotment was not purchased until 1959 to build the Carlingford electrical control centre and substation (when Frederick Cox's Blenheim house was still standing).¹⁵ However, the similarity to the layout of the later substation visible in 1965 aerial imagery is striking, and suggests it was either under construction already, or followed the same general layout as the flower farm (Figure 11).

By 1965 the earlier buildings have been demolished, and a larger complex with the same footprint as the current buildings had been constructed. Any vegetation apart from grass has been completely cleared and replaced by carparking around the site. The K13 Memorial on the opposite side of Pennant Hills Road had been completed, and the previous irregular alignment of Felton Road was straightened and widened, resuming land on the northern side of that road adjacent to the completed substation. Although not visible, the new complex would have entailed ground disturbance associated with the demolition and construction of buildings, and the installation of new services. At this time the Project Area was surrounded by mainly residential bungalow-style properties, apart from the completed substation on the northern side of Felton Road. A new high school, James Ruse High, was also built in 1959 west of the substation on Felton Road, to meet the needs of the growing community, and older large houses such as Blenheim had been demolished to make way for the substation. Aerial photography shows little change in the area from the 1970s through to 2014 (Figure 12), by which time houses on the opposite side of Pennant Hills Road, south of the K13 Memorial, had been demolished to make way for the current low-level unit buildings.

¹⁵ Trimmer 2006:101.



Figure 9. The Project Area in 1943. (Source: NSW Historical Imagery Viewer)



Figure 10. The Project Area in 1955. (Source: NSW Historical Imagery Viewer)



Figure 11. The Project Area in 1965 showing the completed K13 memorial. (Source: NSW Historical Imagery Viewer)



Figure 12. The Project Area in 2014. (Source: NSW Historical Imagery Viewer)

1.2.1 Chronological Outline

A summary of the major milestones relating to the Project Area is provided below in Table 2.

Table 2. Timeline for the Project Area.

Date	Phase	Detail
Pre 1788	Aboriginal occupation	Occupied by the Wallumedegal people
1794	Initial land grant incorporating Project Area	Two separate grants of 30 acres and 80 acres made to Michael Fitzgerald
1794-1825	Pennant Hills Road becomes main route to Carlingford	All land along the road allocated by 1825
1830s-c.1910	Increasing settlement and agricultural use throughout 19 th century	Development of successful agricultural and horticultural properties and mixed occupancy
1880s	Calls for railway to be built	Fruit growers agitate for better transportation options
1888-1896	Private railways	Railway from Clyde to Rosehill built in 1888; line extended to Carlingford in 1896
1896-1901	Transition to Government railway	Both private lines close in 1896 and reopen in 1901 after purchase by Government
c.1910-1950s	Opening up for residential settlement	Earlier large grants subdivided; unknown development in Project Area
1960s - present	Current building occupies Project Area	Suburb shifts from agricultural uses to a mix of residential and commercial holdings

1.3 Physical Analysis

An inspection of the Project Area was undertaken on 27 September 2024 by Holly Winter (Senior Heritage Consultant) and Tiffany Jones (Heritage Consultant) from Heritage Now.

The Project Area currently comprises a mid-20th century commercial premises at 241-245 Pennant Hills Road, Carlingford. This building encompasses the majority of the site, with parking spaces to the north, south and west of the building.

The site is accessed via an asphalted driveway on Pennant Hills Road, which opens to a carpark along the front of the building facing onto Pennant Hills Road (Plate 1), and a second driveway at the very eastern end of Felton Road connected to the first driveway and parking area (Plate 2, Plate 3). The site is retained by a low machine-made brick wall, and appears to have been built up to contain fill that was used to level the area for the construction of the building (Plate 4, Plate 5). Trees line Pennant Hills Road for privacy, and a garden containing shrubs and bushes is present in front of the building and carpark. The front of the commercial building is more modernised, using rendering that is painted a dark blue-grey, with large glass panelled windows and business signage (Plate 6, Plate 7).

The south-western part of the building is constructed of orange machine made bricks, which are visible without any rendering (Plate 8, Plate 9). Despite the site being built up using levelling fill, there are several areas that have been impacted to some depth, including large water drainage

systems evident across the site (Plate 10), and the inclusion of a basement level to the property (Plate 11).

A small, grassed area is present at the south-western corner of the building (Plate 12). On top of the brick retaining wall surrounding the site was a wooden panelled fencing along the western boundary of the Project Area (Plate 13). The site dropped down to the west, as evident through the fencing and the visible step down to the construction site of the new apartment buildings adjacent to the property (Plate 14). Trees and shrubs were evident along the western and northern boundary of the property.

Another entryway into the property was present from Felton Road in the north-west of the site, with a large metal-grated sliding security gate hindering access to this part of the site (Plate 15). This space was utilised as a carpark for employees, and a potential loading dock is evident along the western side of the building (Plate 9, Plate 16). The windows at the rear of the building have vertical shutters (Plate 16). A chain link fence guards the northern boundary of the site, with a pedestrian gate and walkway (Plate 17) providing access to a back entrance to the commercial building, which had large glass window panes and was more modernised than the parts of the building on either side of this paved back entrance (Plate 18). A large informal parking area, laid with a small gravel topping, was present along the north and north-east part of the site (Plate 19).

1.3.1 Settings and View

The area to the north of the Project Area, on the other side of Felton Road, contains the Carlingford Substation. Residential zones to the west, south and east surround the Project Area with single-, double- and multi-storey housing (Plate 20).

In terms of heritage items in the vicinity, the K13 memorial (LEP #I038) to the south-east is separated from the Project Area by Pennant Hills Road (Plate 21). The memorial is clearly visible from the Project Area, although the view is obscured by the road and its traffic. The memorial is meant to be viewed facing the south, away from the Project Area, across the Dundas Valley (Plate 22). The staircase leading down from Pennant Hills Road to the memorial also directs the view, like a theatre. The surrounding views of the memorial are already impacted by a multi-storey residential building to the west, although the other directional views are not affected (Plate 23). Facing away from the memorial to the north, the Project Area and current buildings are visible, with Pennant Hills Road forming a buffer between the memorial and the Project Area (Plate 24).

The other heritage item in the vicinity is the Carlingford Stock Feeds (LEP #I042), to the north-east of the site. This heritage item is difficult to see from the Project Area, and the views are obstructed by a service station, other residential towers, and trees (Plate 25).

2 Significance Assessment

The meaning of cultural significance is defined in the Burra Charter as: *aesthetic, historic, scientific, social or spiritual value for past, present or future generations*.¹⁶ These values are expressed as specific criteria adopted by the NSW Heritage Council, and are used to assess whether an item is of State or local heritage significance in New South Wales.¹⁷ The criteria are as follows:

Criterion a) An item is important in the course, or pattern, of NSW's cultural or natural history (or the cultural or natural history of the local area);

Criterion b) An item has strong or special association with the life or works of a person, or group of persons, of importance in NSW's cultural or natural history (or the cultural or natural history of the local area);

Criterion (c) An item is important in demonstrating aesthetic characteristics and/or a high degree of creative or technical achievement in NSW (or the local area)

Criterion (d) An item has strong or special association with a particular community or cultural group in NSW (or the local area) for social, cultural or spiritual reasons;

Criterion (e) An item has potential to yield information that will contribute to an understanding of NSW's cultural or natural history (or the cultural or natural history of the local area);

Criterion (f) An item possesses uncommon, rare or endangered aspects of NSW's cultural or natural history (or the cultural or natural history of the local area);

Criterion (g) An item is important in demonstrating the principal characteristics of a class of NSW's cultural or natural places; or cultural or natural environments, or a class of the local area's cultural or natural places; or cultural or natural environments.

The Project Area is not a heritage item, however there are two listed heritage items within the vicinity of the Project Area (Figure 13). As such, no significance assessment is required for the Project Area. The information below relates to nearby items, listed as having local heritage significance in the Parramatta LEP 2023.

¹⁶

Australia ICOMOS, "The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance," 2013, 2.

¹⁷

Department of Planning and Environment, "Assessing Heritage Significance: Guidelines for Assessing Places and Objects against the Heritage Council of NSW Criteria" (Parramatta: Department of Planning and Environment, 2023).

2.1 Statement of Significance

Two heritage items are located in the vicinity of the Project Area (Figure 13). The following statements of significance are reproduced from the State Heritage Inventory sheets.

- K13 Memorial, 304 Pennant Hills Road DUNDAS NSW 2117 (LEP #I038)

K13 Memorial is of significance for Parramatta LGA for aesthetic, social and reasons of rarity. The Memorial to all HM submarines and submarine crews has a major social significance and is relatively rare in the local area. Some additional importance is derived from the associations with its architect and sculptor.

- Carlingford Stock Feeds, 1 Thallon Street CARLINGFORD NSW 2118 (LEP #I042)

The Carlingford Produce Store is of local significance as an assemblage of vernacular functional buildings comprising the 1927 Feed Mill and incorporating elements from 1902 to the present day. It is representative of vernacular timber and corrugated galvanised iron rural/industrial buildings built in Sydney during the first half of the 20th Century. The building is historically significant as tangible evidence of farming and transport practices in the Carlingford area from the early 20th Century through to the present. It has provided agricultural supplies to the Hills and surrounding districts continuously for 85 years and it also operated as a feed mill for around 60 years. It has social significance for families of past members, customers and staff of the original Producers Cooperative Company and its successors. The store has associations with William Gooden, the Post WWII Chairman and Managing Director responsible for the expansion of the Cooperative – he developed links with the farming and broader communities including local firms and James Ruse Agricultural High School. The site is a rare surviving example of a purpose built agricultural building in the area, containing operable vintage milling equipment from the first half of the 20th Century. The store has the potential to demonstrate grain handling and feed milling processes in an authentic context. The surviving equipment, chutes, fittings, timber grain bins, motors, engines and shafts permit a range of interpretive experiences.



Figure 13. Heritage items located near the Project Area. (Source: SCP with Heritage Now additions)

3 Proposed Works

3.1 The Proposal

The building currently occupying the Project Area will be demolished, and a mixed commercial and residential tower building will be constructed, occupying the eastern half of Lot 1 DP805059 and the whole of Lot 2 DP805059 of the Project Area (Figure 14, Figure 15).¹⁸ The western half of Lot 1 DP805059 will also be redeveloped with new housing units and commercial premises (Figure 16). A small area at the southern end of Lot 1, and another area at the north-eastern end of the Project Area, in the area of Lots 5 and 6 DP805059, have been excluded from the proposed footprint as they have been dedicated to RMS for future road widening. A total of 2147m² of the proposed 6330m² Project Area is proposed for commercial use, including a childcare.

The current application under the NSW Government 30% Affordable Housing Bonus Scheme, to assess potential to increase the building yield, occupies the same footprint. The current proposed tower building is 49m (14 storeys) in height (with a further three levels of basement servicing the whole site) with of yield of 97 residential units, and it is proposed this be increased to 63m (17 storeys) in height, resulting in an increase to approximately 140 residential units as per drawings in revised indicative plans (Figure 17, Figure 17). The proposed scheme would retain the currently proposed 14m building height along its western boundary. The scheme does not include 565m² of land nominated to be dedicated for future road widening.



¹⁸ Planning Proposal 2020CCI004 – Parramatta City Council – PGR_2016_SYW_002_00

Figure 14. Indicative drawing showing the ground level plan of proposed works of the Project Area. (Source: Kennedy Associates Architects, May 2025, 1804-SD0101)

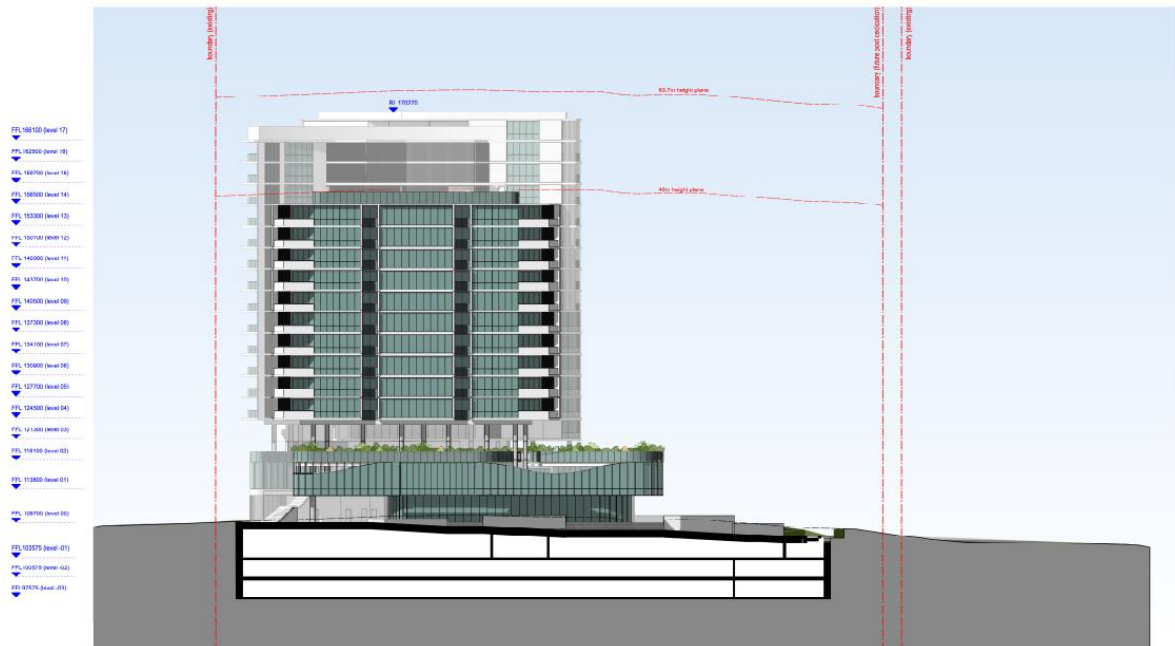


Figure 15. Section showing the mixed commercial and residential tower building that will be constructed, with basement levels visible and the proposed building heights (Source: Kennedy Associates Architects, May 2025, 1804-SD0301)

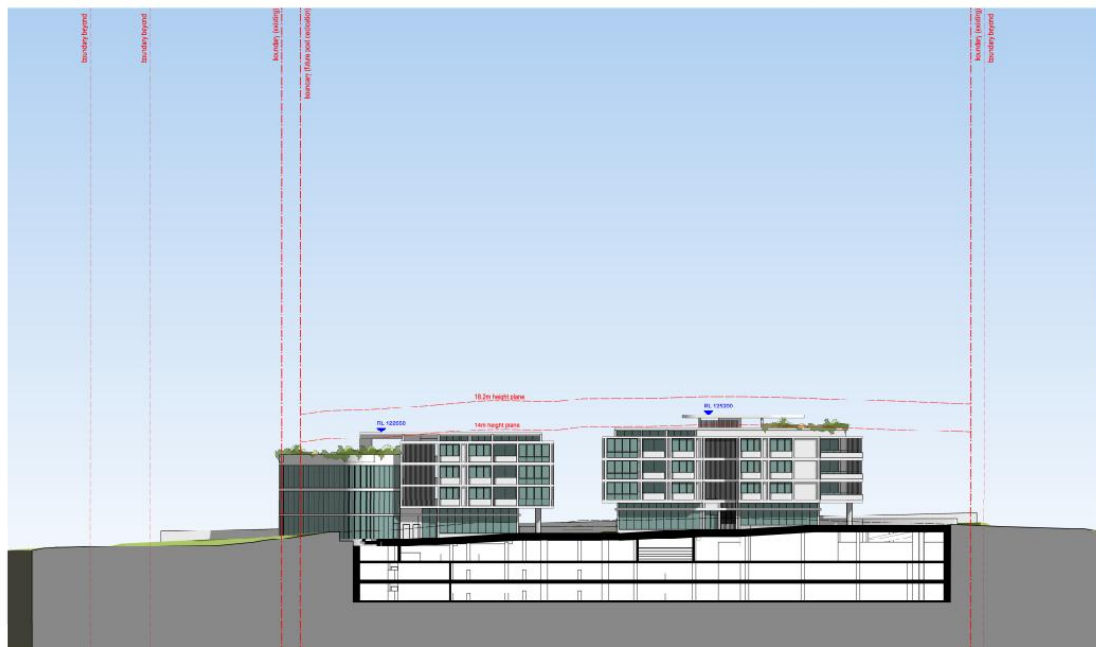


Figure 16. Section showing the residential and commercial premises along the west of the Project Area, with basement levels visible and the proposed building heights (Source: Kennedy Associates Architects, May 2025, 1804-SD0302)

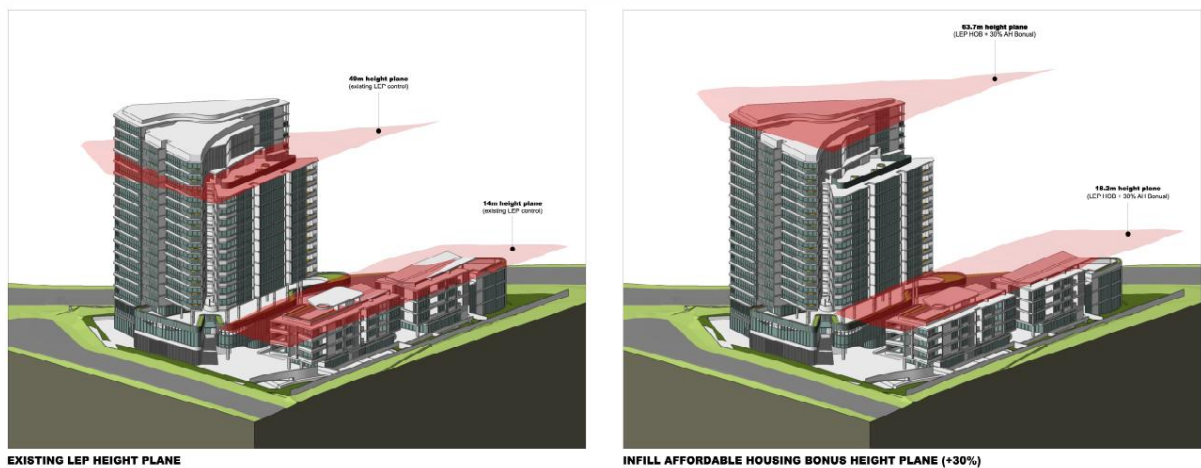


Figure 17. Indicative drawings showing proposed increase in building heights, with lower height on western side. (Source: Kennedy Associates Architects, May 2025, 1804-SD0351)

3.2 Background

3.2.1 Pre-lodgement Consultation

No pre-lodgement consultations, approvals and/or exemptions relating to heritage are known to have occurred regarding the Planning Proposal to rezone the Project Area.

3.2.2 Considerations of Alternatives

No alternative options have been considered for the redevelopment of the Project Area.

4 Heritage Impact Assessment

4.1 Matters for Consideration

The SSD application for a mixed-use development at 241-245 Pennant Hills Road, Carlingford will enable approximately 1956m² of commercial area to be redeveloped. Potential heritage impacts are assessed below.

4.1.1 Fabric and Spatial Arrangements

No heritage items have been identified in the Project Area. The development of the Project Area will not impact the fabric or spatial arrangements of heritage items in the vicinity.

4.1.2 Setting, Views and Vistas

The proposed redevelopment will result in minimal impacts to heritage items in the vicinity of the Project Area. Physical separation of heritage items in the vicinity of the Project Area includes the 'K13 Memorial' by Pennant Hills Road, and the 'Carlingford Stock Feeds' by Pennant Hills and Jenkins Roads and a service station at the corner of these roads.

The K13 Memorial is meant to be viewed facing the south, away from the Project Area, across the Dundas Valley. The staircase leading down from Pennant Hills Road to the memorial also directs the view, like a theatre. The surrounding views of the memorial are already impacted by a multi-storey residential building to the west, although the other directional views are not affected. While the views facing away from the memorial to the north will be altered with the addition of the new mixed-use development of the Project Area, it will not directly impact the immediate views of the heritage item.

Views to and from the Carlingford Stock Feeds are screened by remnant buildings, roads and vegetation located around the northern, eastern and southern boundaries of the Project Area.

4.1.3 Landscape

The proposed redevelopment works will not impact on any heritage items in the vicinity of the Project Area.

4.1.4 Use

The use of the Project Area will largely remain the same, with the addition of residential use. No heritage items have been identified within the Project Area that will be impacted.

4.1.5 Demolition

While the current commercial building on the site will be demolished, no demolition of heritage items in the vicinity of the Project Area are proposed.

4.1.6 Curtilage

No changes to the existing curtilages of heritage items in the vicinity of the Project Area are proposed.

4.1.7 Moveable Heritage

No items of moveable heritage are located within the Project Area.

4.1.8 Aboriginal Cultural Heritage

No Aboriginal objects or areas of archaeological potential have been identified within the Project Area. Aboriginal cultural heritage values are assessed in the following report:

- Heritage Now. *Aboriginal Due Diligence Assessment Report – 241-245 Pennant Hills Road, Carlingford*. 2024.

4.1.9 Historical Archaeology

Based on the historic context and an analysis of historical aerial imagery, the Project Area saw no substantive development or occupation until the mid-20th century. No activities or structures have been identified that are likely to have left features within the Project Area likely to be of local or State significance and considered ‘relics’ under the *Heritage Act 1977*.

4.1.10 Natural Heritage

No heritage items with natural heritage values are located in or within the vicinity of the Project Area.

4.1.11 Conservation Areas

The Project Area is not within a heritage conservation area.

4.1.12 Cumulative Impacts

No heritage items have been identified within the Project Area, and the views between the Project Area and nearby heritage items will not be directly impacted. As such, no cumulative impacts have been identified in regard to heritage items in the vicinity.

4.1.13 The Conservation Management Plan

No conservation management plans have been identified for heritage items in the vicinity of the Project Area.

4.1.14 Other Heritage Items in the Vicinity

The closest of two nearby heritage items is the K13 Memorial at 304 Pennant Hills Road, on the eastern side of Pennant Hills Road, immediately opposite the Project Area. It consists of a stone memorial and pool within a small park set back from the main road. The memorial commemorates those who lost their lives following the sinking due to accidental causes of the K13 submarine off the coast of Scotland in 1917. The land and memorial were donated by the family of Charles Albert

Freestone following his death; Freestone was a Parramatta businessman who had served on the K13 and later emigrated to Australia. The monument is further dedicated to all submarines and crews who lost their lives between 1914 and 1955. The memorial was unveiled in September 1961 and is considered significant for aesthetic and social reasons, and for its rarity.¹⁹

The Carlingford Stock Feeds site, also known as Carlingford Produce Store, to the north-east of the Project Area relates to a collection of timber and corrugated iron buildings dating from 1902. It includes the 1927 Feed Mill which includes vintage milling equipment from the first half of the 20th century. The produce store has provided agricultural supplies to the local area for nearly 100 years, and is considered historically significant as a tangible link to the agricultural and transport history of the Carlingford area.²⁰ A produce store operated continuously from the complex until 2021.

The proposed redevelopment will result in no impacts to heritage items in the vicinity of the Project Area. Individually listed heritage items are separated physically from the Project Area: 'K13 Memorial' by Pennant Hills Road, and the 'Carlingford Stock Feeds' by Pennant Hills and Jenkins Roads and a service station at the corner of these roads. Views to and from the Carlingford Stock Feeds are screened by remnant buildings, roads and vegetation located around the northern, eastern and southern boundaries of the Project Area.

The K13 Memorial is meant to be viewed facing the south, away from the Project Area, across the Dundas Valley. The staircase leading down from Pennant Hills Road to the memorial also directs the view, like a theatre. The surrounding views of the memorial are already impacted by a multi-storey residential building to the west, although the other directional views are not affected. Despite the proposed multi-storey development of the Project Area, the works and proposed building will not directly impact the immediate views of the heritage item.

4.1.15 Commonwealth/National Heritage Significance

No items on the Commonwealth Heritage List or National Heritage List are located in or within the vicinity of the Project Area.

4.1.16 World Heritage Significance

No properties on the World Heritage List are located in or within the vicinity of the Project Area.

¹⁹ NSW SHI, item 1038.

²⁰ NSW SHI, item 1042.

5 Summary and Recommendations

Heritage Now Pty Ltd was engaged by Triple Eight Corporation Pty Ltd on behalf of The Carlingford Unit Trust to prepare a Statement of Heritage Impact as part of a State Significant Development application for a mixed-use development at Carlingford. The Project Area is located at 241-245 Pennant Hills Road, Carlingford and consists of a mixed-use commercial premises.

Historically, the Project Area falls within the boundaries of the early land grant of Portion 106 of the Parish of Field of Mars, and indicates the Project Area was located within hilly country near areas used for timber getting, occupying a small portion of land in the north-western corner of Michael Fitzgerald's grant. By the 1830s, much of the economy in the area was based on horticulture or mixed agriculture benefitting from earlier land clearing from timber getting. From the parish maps in the late 19th century and early 20th century, there were no structures present on the site at this time. By 1955 there are some minor changes within the Project Area, and increasing development in the surrounding area. The K13 Memorial on the opposite side of Pennant Hills Road had been completed by 1961. By 1965 the earlier buildings within the Project Area were demolished and a larger complex, with the same footprint as the buildings on the site today, was constructed.

The Project Area is not listed on any statutory heritage lists or registers, and it does not contain any elements with built heritage significance. All structures within the Project Area date to the mid to late 20th century. However, there are two local heritage items in the vicinity (within 200m):

- K13 Memorial - 304 Pennant Hills Road, Dundas NSW 2117 (LEP #I038)
- Carlingford Stock Feeds - 1 Thallon Street, Carlingford NSW 2118 (LEP #I042).

The proposed redevelopment will result in no impacts to heritage items in the vicinity of the Project Area. Individually listed heritage items are separated physically from the Project Area: 'K13 Memorial' by Pennant Hills Road, and the 'Carlingford Stock Feeds' by Pennant Hills and Jenkins Roads and a service station at the corner of these roads. Views to and from the Carlingford Stock Feeds are screened by remnant buildings, roads and vegetation located around the northern, eastern and southern boundaries of the Project Area.

The K13 Memorial is meant to be viewed facing the south, away from the Project Area, across the Dundas Valley. The staircase leading down from Pennant Hills Road to the memorial also directs the view, like a theatre. The surrounding views of the memorial are already impacted by a multi-storey residential building to the west, although the other directional views are not affected. Despite the proposed multi-storey development of the Project Area, the works and proposed building will not directly impact the immediate views of the heritage item.

No heritage impacts have been identified as part of this SoHI and the following recommendations can be made for the Project Area:

Recommendation 1

The State Significant Development of the Project Area will have no impact on the significance of heritage items in the vicinity of the Project Area. For this reason, there are no identified historic (European) heritage/archaeological constraints to the redevelopment works of the Project Area.

Recommendation 2

A heritage induction is to be provided to all on-site personnel undertaking construction works so that they understand their obligations for protecting heritage under the *Heritage Act 1977*. This includes protection of built heritage and historical archaeological sites and the reporting of any new or suspected heritage site/s. This may be done through an on-site induction or other suitable format.

Recommendation 3

In the unlikely event archaeological, or suspected archaeological material is uncovered during works, then works in that area are to cease and the area is to be cordoned off. The material is to be inspected by a heritage consultant and works in that area are only to recommence once heritage clearance has been gained and/or mitigation and management measures implemented.

Recommendation 4

In the unlikely event that human remains, or suspected human remains are uncovered during the development, then works in that area are to stop and the area is to be cordoned off. The project manager is to contact the NSW Police to establish whether the area is a crime scene. If it is not a crime scene, then Heritage NSW will be consulted. The ideal conservation outcome is to leave the human remains undisturbed, however, if this is not possible then an appropriate approval will be sought from Heritage NSW.

6 References

- Australia ICOMOS. "The Burra Charter: The Australia ICOMOS Charter for Places of Cultural Significance," 2013.
- Department of Planning and Environment. "Assessing Heritage Significance: Guidelines for Assessing Places and Objects against the Heritage Council of NSW Criteria." Parramatta: Department of Planning and Environment, 2023.
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- Wise's *New South Wales Post Office Directory*. Vol. 1922. Sydney: Wise's Directories, 1922.
<https://nla.gov.au/nla.obj-660770687>.

7 Plates



Plate 1. Main driveway up to the commercial building from Pennant Hills Road. (Source: Heritage Now 2024)



Plate 2. Additional driveway leading from the eastern end of Felton Road. (Source: Heritage Now 2024)



Plate 3. Carpark at front of building along Pennant Hills Road. (Source: Heritage Now 2024)



Plate 4. Machine-made brick retaining wall present around whole of property. (Source: Heritage Now 2024)



Plate 5. Front of property along Pennant Hills Road with brick retaining wall present, showing extent of fill used to build up the Project Area. (Source: Heritage Now 2024)



Plate 6. Front of building facing onto Pennant Hills Road, showing rendering of building and glass panelling. (Source: Heritage Now 2024)



Plate 7. Windows and signage of building facing onto Pennant Hills Road. (Source: Heritage Now 2024)



Plate 8. South-western part of the building that was constructed using exposed orange machine-made bricks. (Source: Heritage Now 2024)



Plate 9. Western side of building, showing the use of the orange machine-made bricks. (Source: Heritage Now 2024)



Plate 10. Deep drainage system present in the west of the Project Area, with grating covering the drain. (Source: Heritage Now 2024)

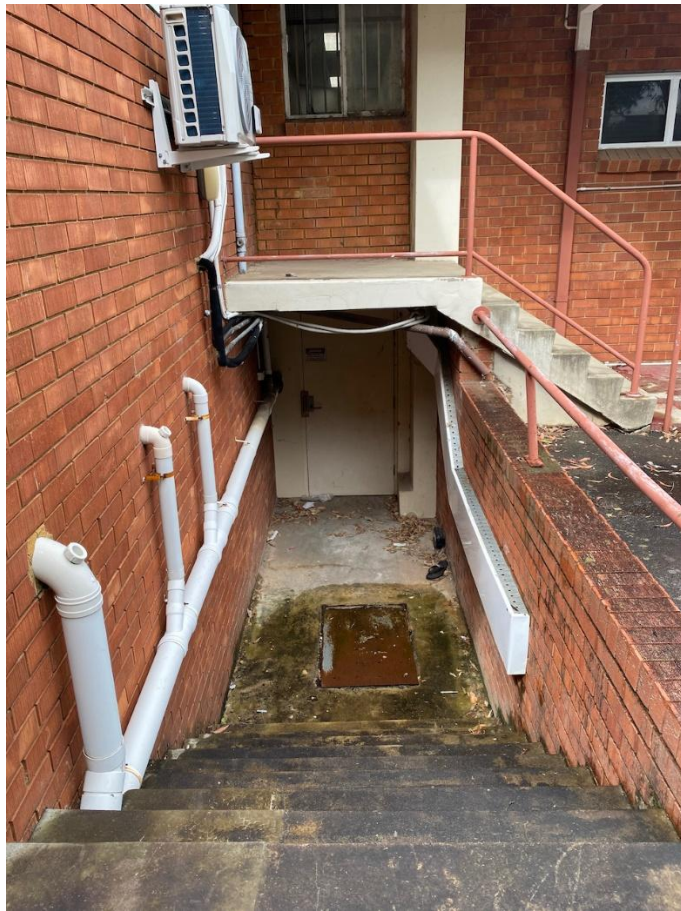


Plate 11. Basement level entrance along the west side of the building, showing stairs leading down to the entrance. (Source: Heritage Now 2024)



Plate 12. Grassed area in south-western corner of site, shielded with vegetation along the Pennant Hills Road side. Brick retaining wall and wooden fencing visible in the background. (Source: Heritage Now 2024)

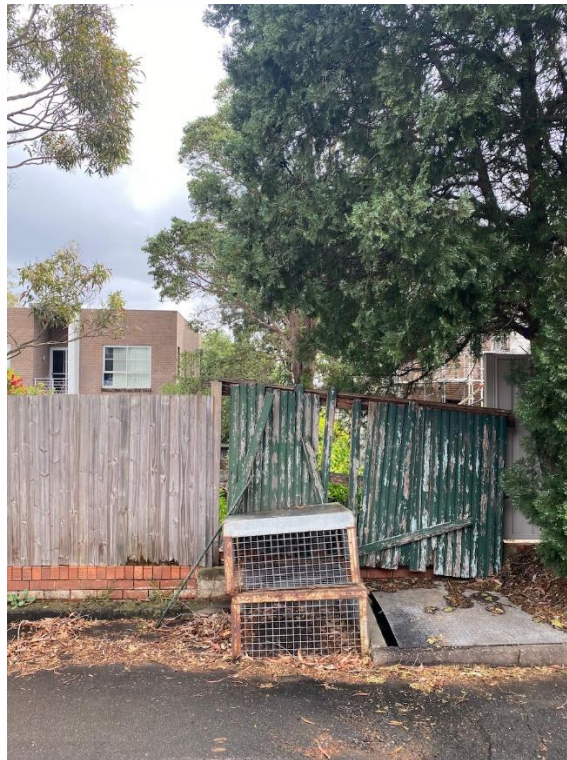


Plate 13. Wooden fencing along western boundary of the Project Area. (Source: Heritage Now 2024)



Plate 14. Gap through fencing showing the drop down to the west in the adjacent property. (Source: Heritage Now 2024)



Plate 15. Entry to property from Felton Road through metal security gate. (Source: Heritage Now 2024)



Plate 16. North-western corner of site used as a carpark. Brick building with large, shuttered windows present. (Source: Heritage Now 2024)



Plate 17. Pedestrian access gate and walkway. (Source: Heritage Now 2024)



Plate 18. Rear of building facing Felton Street, showing a glass entrance and paved area. (Source: Heritage Now 2024)



Plate 19. Informal gravel carparking area at rear of site. (Source: Heritage Now 2024)



Plate 20. Construction of new residential buildings along the west of the site. (Source: Heritage Now 2024)



Plate 21. View from Project Area across Pennant Hills Road to the K13 memorial. (Source: Heritage Now 2024)



Plate 22. View of the K13 memorial to the south, looking away from the Project Area. (Source: Heritage Now 2024)



Plate 23. K13 memorial with residential buildings to the west. (Source: Heritage Now 2024)



Plate 24. View from the K13 memorial to the north, with the Project Area visible across Pennant Hills Road. (Source: Heritage Now 2024)

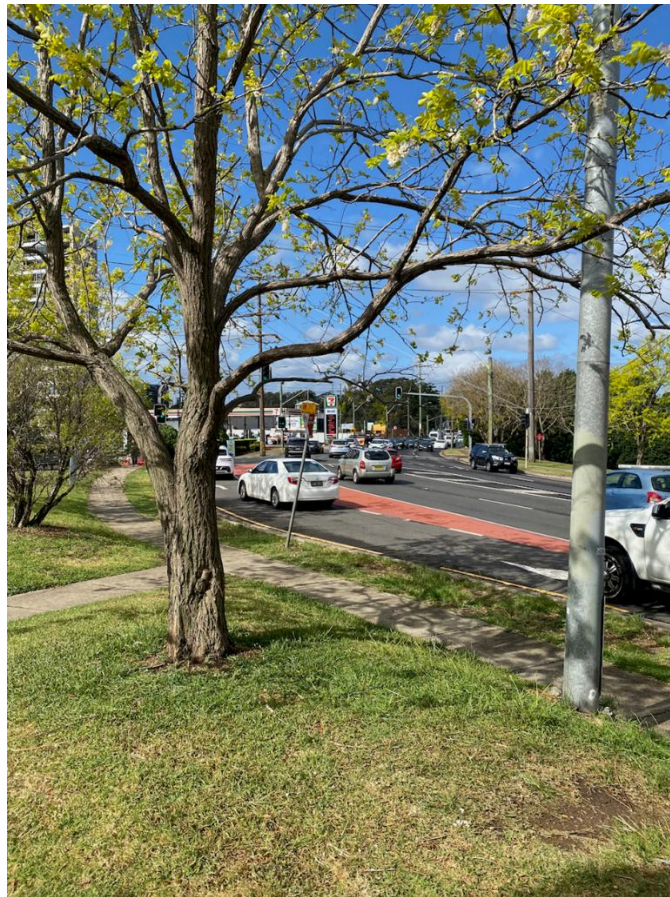


Plate 25. View from the Project Area to the Carlingford Stock Feeds, with the view largely obstructed. (Source: Heritage Now 2024)