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14 Highfield Road
LINDFIELD NSW 2070

17 February 2026

Department of Planning Housing and Infrastructure
Locked Bag 5022
PARRAMATTA NSW 2124

Submitted via NSW Planning Portal

Attention: Joe Somerville

Dear Sir,

SUBMISSION OF OBJECTION

Re: Submission to exhibition of SSD-85974227 at 9-17 Balfour Street, Lindfield

I am writing as the owner of 14 Highfield Road Lindfield in relation to SSD-85974227 at 9-17 Balfour Street Lindfield ("the development site").

I object to the proposed development SSD-85974227 for the reasons presented below and on the following pages:

These points of objection are based on the review of supplied documents and my knowledge and experience of living in Lindfield since early 2000. Please read this objection in conjunction with the objection submitted by Mr Dan Brindle of BBC Consulting Planners on behalf of the owners of 8 to 14 Highfield Road, Lindfield.

The Balfour Street/Highfield Road Heritage Conservation Area (c29) (HCA) on which both this SSD-85974227 and the earlier adjacent one SSD-82709458 are sited, is a totally unsuitable location for high-rise. The HCA also forms a known haven for protected outstanding biodiversity value land at the rear of all properties in this HCA comprising both Sydney Turpentine-Ironbark Forest and Sydney Blue Gum Forest. My objection is detailed in the following pages. This is a short summary of why development at this location is unsuitable:

1. Sydney Turpentine-Ironbark Forest (STIF) (PCT3236) – a Critically Endangered Ecological Community in Sydney.
(<https://threatenedspecies.bionet.nsw.gov.au/profile?id=10789>). It is listed as serious

and irreversible impact (SAIL) entity in the Guidance to Assist a Decision Maker to determine a serious and Irreversible Impact.

2. Blue Gum High Forest of the Sydney Basin Bioregion (Sydney Blue Gum Forest) is considered important as Biodiversity Reservoirs and is listed as an endangered ecological community under the NSW Threatened Species Conservation Act 1995 and has been judged as eligible for listing as Critically Endangered under the EPBC Act. (<https://www.dcceew.gov.au/environment/biodiversity/threatened/conservation-advice/blue-gum-high-forest-sydney-region>).
3. Wildlife corridor – site has been mapped as having significant biodiversity value. It shelters and provides a valuable connection to other native corridors for a variety of native flora and fauna which are unique in a setting close to amenities and should be saved. These include Southern Long-nosed Bandicoots; Tawny Frogmouths; Australian Water Dragons and several varieties of micro bats.
4. Subject site is associated with a Critically Endangered Ecological Community (CEEC) under the BC Act.
5. Geotechnical Investigation Report and Groundwater Seepage Analysis both contain many deficiencies and thus fall short of expectations. This could be due to a higher water table than is ideal to support a large development. Thus, unless additional investigations are properly carried out the reports and development at this site should be rejected.
6. The Balfour Street/Highfield Road HCA is unique in that it demonstrates a progression in building styles from the 1890s to the early 1920s and thus these houses individually and jointly contribute to the streetscape appeal and aesthetic character of Lindfield. As a complete collection of houses built for middle-class families any destruction would be a great loss of the area's early character. They are a type that is not well represented elsewhere in Lindfield's recognised heritage.
7. The North District Plan in the housing section of Ku-ring-gai's Local Strategic Planning Statement (LSPS) states the following to inform the Housing Strategy (2016-2036):
"In considering areas for future medium and high-density housing forms, the following areas are to be avoided:
 - *heritage conservation areas*
 - *areas of visual and aesthetic quality and character*
 - *areas of intact tree canopy where the built form does not sit under the canopy*
 - *areas with environmental values"*
8. Precinct Issues. Our HCA is surrounded by thoroughfare streets, schools, the second largest Coles in the southern hemisphere, an electricity substation and a narrow nearly one-way street. This all contributes to a potentially unsafe environment for very young school children and means the area is unsuitable and unable to accommodate high-rise development within its bounds if it is expected to continue to function as a much-needed community area. Full details of the issues are included in this objection.

My property is northwest of the development site on the same physical block, and both are part of the Balfour Street/Highfield Road Heritage Conservation Area (c29). The relationship between my property and the development site is shown below:



There are inconsistencies between the various documents produced for this development. In addition, they contain material errors, omissions, oversights, inaccuracies and draw incorrect conclusions upon which the development is justified. A good development correctly located with merit will not need to try and hide the truth.

SSD documentation issues

The following lodged documents contain numerous flaws / inaccuracies / inconsistencies / omissions and/or misleading information, and therefore no reliance should be placed on the findings and conclusions in relation to the determination of this SSD. This suggests poor project management by the principles behind this proposal. Very poor or little attention to detail has been given and thus questionable quality assurance practices have been followed during the design phase. These issues are documented throughout this objection.

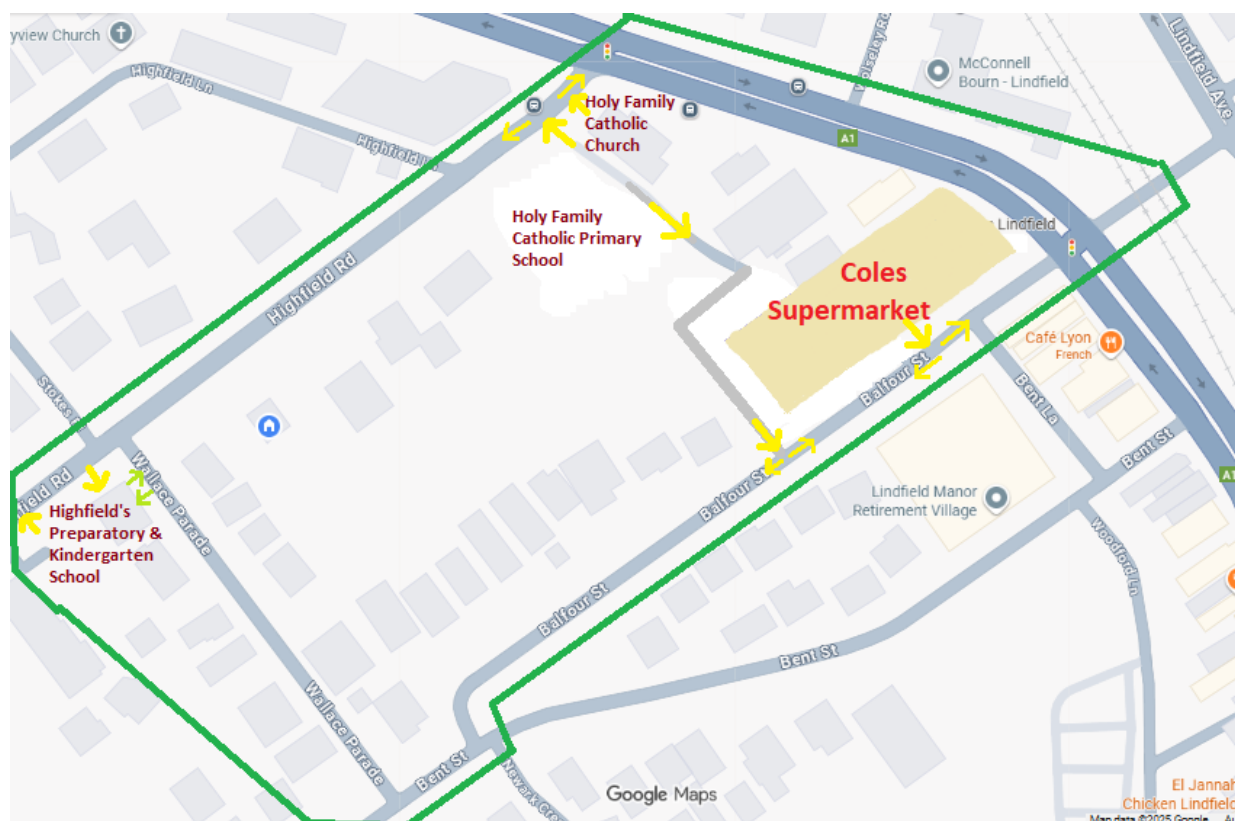
- Clause 4.6 Request
- Biodiversity Development Assessment Report (BDAR)
- Arbicultural Impact Appraisal
- Landscape Plan
- Architectural Plans
- Social Impact Scoping Study

- Transport Impact Assessment
- Urban Design Report
- Geotechnical Investigation Report
- Groundwater Seepage Analysis
- Aboriginal Due Diligence Assessment
- Heritage Impact Statement

Providers of such reports should be held to a code of ethics in that their reports should be complete, error free, objective and not written to either support or reject a proposal.

Our Precinct issues

Our Precinct is defined as the area bounded by or including both sides of the Pacific Highway, Highfield Road, Wallace Parade, Bent Street, Balfour Street and Balfour Lane, Lindfield. This includes a major Coles Supermarket, Holy Family Catholic Church (services held daily and six times on weekends), Holy Family Catholic Primary School and Highfield's Preparatory & Kindergarten School. (See map below).



I strongly believe that further development within our precinct is inappropriate.

Our Precinct (defined above) has the following:

- Holy Family Catholic Primary School;
- Highfield's Preparatory & Kindergarten School;
- Ready Steady Go Kids Lindfield;

- Holy Family Catholic Church;
- Large Coles Supermarket;
- Hundreds of children and pedestrians;
- Both Highfield Rd and Balfour St slope steeply downhill;
- Wallace Pde is the only narrow cross street;
- Adjoining retirement village;
- Heavy local traffic;
- Heavy through traffic;
- Long traffic queues during peak times;
- No additional on-street parking available;
- Large scale adjoining planned development;
- Local planned road closures and changes; and
- Resultant safety issues.

Further development within the Precinct is inappropriate given the following identified current and future issues:

1. The Coles Supermarket has two exits and entrances onto Balfour St (where traffic can turn left or right), and from an upper entrance/exit onto Balfour Lane servicing apartments above Coles. The Church has an entrance from Balfour Lane and a limited entrance from Highfield Rd for funeral hearses. The Primary School has an entrance from Balfour Lane and an exit onto Highfield Rd. The Preparatory School has an entrance and exit on Highfield Rd, with pedestrian entrances on Wallace Pde and Highfield Rd. These places generate significant pedestrian and motor traffic.
2. Highfield Rd is a through road for traffic from Lady Game Drive to the Pacific Hwy, funnelling traffic north from Macquarie Park, Pymble, West Lindfield, Epping Road, the M2, and south from Chatswood, Killara, Roseville, and beyond.
3. Wallace Pde is the only cross street between Highfield Rd and Balfour St and struggles to safely contend with traffic flow. Wallace Pde is a narrow road where cars going in opposite directions cannot pass easily. There is no alternative thoroughfare for cars moving between Balfour St and Highfield Rd. Traffic banks up daily in Balfour St and Highfield Rd at peak usage times, when Wallace Pde functions as a one-way street.
4. Balfour St feeds onto one of the few underpasses linking to the eastern side of the railway line. Traffic on the Balfour St and Lindfield Avenue sides of the underpass already forms a bottleneck. Turns are dangerous in these streets and onto the Pacific Highway.
5. Exit from properties onto Highfield Rd is already very dangerous owing to parked vehicles blocking the traffic view, especially during peak hours and school drop-off and collection times.
6. There are no traffic management controls to manage increased traffic from construction activities and increased resident numbers.
7. Highfield Rd, Wallace Pde and Balfour St are each weekday already parked out by workers, commuters, nearby apartment visitors, Church and School attendees. The Precinct cannot accommodate any additional on-street parking.
8. During drop-off and pick-up times from Holy Family Catholic Primary School, traffic is queued from the school, along Balfour Lane and down the full length of Balfour St beyond and on Wallace Pde and impedes access for anyone in the Precinct.
9. For safety reasons, Ku-ring-gai Council proposes to stop traffic turning right from Havilah Rd (opposite Balfour St on the Eastern side of the railway line) onto the Pacific Hwy. [<https://www.krg.nsw.gov.au/Council/News-and-media/Latest-news/Investigative->

roadworks-Pacific-Highway-Balfour-St-and-Havilah-Rd2] Drivers from the Lindfield Village shops will need to find alternate measures to turn right but are unlikely use the proposed replacement right turn at Strickland Avenue, which is over half a kilometre in the wrong direction. They are more likely to proceed across into Balfour St, then turn right into Wallace Pde, right again onto Highfield Rd then left onto Pacific Hwy, further adding more traffic to the already overcrowded Precinct.

10. Ku-ring-gai Council also plans to close Bent St at the Pacific Hwy, under the Lindfield Village Hub proposal. [Ku-ring-gai Council - Public Domain Plan for Lindfield 2022 Vol2 p.149 "Create a small urban plaza by closing Bent Street at the intersection of Pacific Highway"]. This will result in drivers using the already crowded roads bounding the Precinct.
11. The loading and unloading of children and pedestrians in the busy roads bounding the Precinct is already dangerous. This danger will only increase with further development in the Precinct and the resulting increased traffic congestion.
12. It seems likely that Bent Street Retirement Village (spanning a block between Balfour St and Bent St) will be redeveloped as high rise living. This will further exacerbate traffic congestion in Balfour St and Wallace Pde (especially if Bent St is narrowed near the Pacific Hwy). Furthermore, drivers will need to turn right from this redevelopment onto the Pacific Hwy via Balfour St, also adding congestion to this already busy intersection.
13. Where will drivers be able to park in the Precinct to attend school parent/teacher interviews, school functions, regular Church services, christenings and funerals?

Further development within the Precinct will impact its functionality for all residents, the two schools, the Church, passing-through traffic, and new residents in high-density developments already proposed in Lindfield (See list below).

I do not understand why an increase in residential density is proposed for the Precinct where traffic congestion has already reached unsustainable levels.

Other Factors:

- 9 out of 10 dwellings have cars (ABS statistics). The numbers of on-site parking in the surrounding proposed developments are inadequate and will further adversely affect the Precinct's functionality.
- Train services issues which limit the number of trains running on the North Shore Line:
 - Currently at peak times train carriages are already full.
 - Heavy rail trains are currently at capacity when crossing Sydney Harbour Bridge – one immediately after another.
 - Safe-working constraints limit adding further train services (safe loading and unloading of passengers, speed on the lines, tight curves, length of sections between stations).
 - Questionable capacity of the electricity supply to power more trains without significant infrastructure upgrades [Last upgrade was in 2017 – <https://www.transport.nsw.gov.au/projects/current-projects/lindfield-substation>].
 - Current poor reliability of trains running to timetable on the North Shore Line.
- Neither original TOD or Council's Preferred Scenario recognised both Schools and the Church in the plans. Services that are needed with the expected population increase.

Future close proximity developments:

- 12-16 Bent St (115 apartments, 29m, SSD-78156462);
- Lindfield Manor Retirement Village re-development (between Balfour St and Bent St);
- Lindfield Village Hub re-development (Bent St and Woodland Lane, 61m);
- Newark Crescent (12m);
- 3-3a Beaconsfield Pde (88 apartments, eDA0180/25, 29m);
- 5-7 Beaconsfield Pde (151 apartments, SSD-85519964, 29m);
- 9-21 Beaconsfield Pde (377 apartments, SSD-81623209, 29m); and
- 2-4 Drover's Way & 9a Gladstone Road (119 apartments, SSD-84875208, 29m).

Planning that can fix these:

- The Precinct cannot support further development for the above reasons. Instead, planning should favour larger developments outside the Precinct that are planned with higher unit numbers.
- Instead of high-rise proposals on northern side of Balfour St (98 + 121 units approx.), these dwelling numbers could easily be accommodated by high-rise development along the Pacific Hwy, without adding to the Precinct's current and future traffic congestion.
- The Precinct should remain a low-density Heritage Conservation Area. The Precinct generally has modest low-rise residential properties and is unsuitable for high-rise development.
- Not replacing low-rise residential and shops along the Pacific Hwy with high-rise development is a lost opportunity to meet the NSW housing targets.
- Ku-ring-gai should follow the examples of Willoughby and North Shore LGAs by placing high-rise along the rail corridor and the Pacific Highway (with affordable housing) and retain all Heritage Conservation Areas as originally planned.
- Why was the area on northern side of Highfield Rd omitted from both the original TOD and Council's preferred scenario? This area is within 350 to 800m easy walking distance from the station. Was this because Highfield Rd was known as a high-volume traffic thoroughfare?

Clause 4.6 request should not be accepted

There has been a request under 4.6 for acceptance of "minor" encroachments on the maximum building height control for the floor area on the top floor of the proposed development. There is no justification for exceeding the height control in this instance. The additional height increase only exacerbates the already overbearing and overwhelming size of this development, the overshadowing and loss of privacy which is not in keeping with the surrounding neighbourhood is outlined in this objection.

In addition, this development is well removed from the Lindfield town centre. There is insufficient setbacks which means the built form is not compatible with the size of the land, and there is no transition in scale between the centres and the adjoining lower density residential and open space zones to protect local amenity.

To the north and northwest of the subject site, the FSR has been reduced and the likelihood of this being developed in the future has been reduced to "not possible". Therefore, the effects of a 10-storey building over a fence next to single dwellings is unacceptable.

Residents in Highfield Road will be overshadowed, including loss of sunlight at times, but from sheer height, overlooking and direct loss of privacy and amenity.

The proposed building already has an additional allowance due to the 30% affordable housing, therefore there is no justification to go to 33.2m – a further increase of 4.6m.

In reference to the objectives of the zone “*to provide housing that is compatible*” – how is 10 stories compatible with a single storey 105-year-old inter-war home?

It is questionable as to whether this location is highly accessible, as there is a considerable hill which must be walked up to get to the railway station or shops. This would be difficult for older or disabled people.

Privacy impacts is not helped by insufficient setbacks to the properties in Highfield Road. These currently do not comply with relevant planning codes.

There is currently a free-standing two storey house with underground parking under construction at 7 Wallace Parade (corner of Wallace Parade and Highfield Road). Thus, making high-rise using this land simply not possible.



Above Photographs: 7 Wallace Parade new house build corner Wallace Parade and Highfield Road Lindfield – taken by D. Palmer 16 February 2026.

Page 1 of the request states “*proposed variation....with no unacceptable, adverse environmental impacts*”. This has completely ignored the loss of solar access and natural cross-ventilation to units within the development; the detrimental impact on the Sydney Turpentine-Ironbark Forest (a critically-endangered ecological community including several mature Sydney Blue Gums); loss of the Native fauna corridor; the Heritage Curtilage of the adjacent Heritage Item and contributory properties in the Balfour Street/Highfield Road Heritage Conservation Area; loss of solar access to neighbouring properties and overshadowing of same. These are unacceptable and adverse environmental impacts from this development.

Knowing that the site slopes down Balfour Street, the building should have been designed to fit within the height plane in the first instance.

The first bullet point on Page 2 will result in overshadowing to public recreation areas (reserve between Balfour Street and Bent Street) during winter solstice (See p.39 in Architectural Plans). In addition, privacy impacts will be seen from and to properties in Highfield Road which will NOT be developed.

As a result of the above and other relevant issues identified in this objection, any development to 9-17 Balfour Street has to take into account the surroundings which will not develop any further, therefore this development is out of character with its surroundings including the Heritage Item at No. 6 Highfield Road and should not proceed.

Clause 4.6 request should therefore NOT be accepted.

Appendix 13 – Biodiversity Development Assessment Report (BDAR)

- 2.2.4 Connectivity p.16 quoted the following from Lindenmayer and Fischer 2006 – *“Landscapes that retain connections between patches of otherwise isolated areas of vegetation are more likely to maintain more numerous and more diverse populations of plant and animal species.”* The proposed development does NOT minimally reduce the cover it reduces the majority of it.
 - Figure 13 p.14 shows dark purple area of biodiversity value of at least 25% of the entire subject area. An area of approx. 890m² of native vegetation will be impacted (p.2). (My calculations: Total Land area = approx. 5679m². 890m² loss of native vegetation is 15.7% of total site area or 18.8% of building footprint area). Reduction of adjoining development (19-25 Balfour St.) has not been taken into account. BDAR for 19-15 Balfour St. was also completed by ACS Environmental and that report was very lacking in objectivity and accuracy (see my Objections lodged for 19-25 Balfour St. on the Planning Portal).
 - P.13 Figure 11 – In photo label says 9 Balfour Street with it also saying Holy Family Catholic Primary School. However, Holy Family Catholic Primary School playground occupies No. 5 Balfour Street, thus this photo has been incorrectly labelled and is thus misleading. How many other errors have been made in this report?
- 2.2.7 Areas of outstanding Biodiversity Value. This says there are none – what about the Sydney Turpentine-Ironbark Forest and Sydney Blue Gum Forest? These are clearly shown in Figure 16. It is a well-known threatened habitat, containing threatened species of trees.
 - Figure 17 on p.21 clearly shows that there are plenty of areas near Lindfield Station that are devoid of Native Vegetation that can be safely used for high-rise. This also shows that a large concentration of Native Vegetation exists at this site that is not in surrounding areas. It links to other



areas of Native Vegetation and MUST be maintained as it is. It forms an important corridor for native wildlife.

- Section 3.1 on p.22 in the second paragraph there is also some remnant native trees at the front of No's 11 and 15 Balfour Street (clearly shown in Figure 18 on p.23, that is designated for destruction. This includes Trees 3 (*Alectryon coriaceus* (rainforest tree) of 12m tall), 68 & 69 (*Melaleuca quinquenervia* (Paperbark) each 18m tall). Thus, the claim here that there are only remnants at the rear of the properties is inaccurate. The fact there are more parts of the Sydney Turpentine-Ironbark Forest adds to the importance of retaining this corridor that connects to other native vegetation areas heading towards the National Park.
- Section 3.2.1 on p.25 agrees that the subject site is associated to a critically endangered ecological community (CEEC) under the BC Act, yet the report says it is OK to destroy 890m² of this same native vegetation. These two premises are at complete odds with one another. Figure 19 on p.26 clearly shows the extent of the distribution of Sydney Turpentine-Ironbark (PCT3236) and Sydney Blue Gum Forest (PCT3136), however it omits the trees at the front of the properties indicated in Figure 6 on p.10 and Figure 18 on p.23.
- Section 3.2.4 on p.28 does not mention the following fauna: King Parrots; Crimson Rosellas; Magpies; Tawny Frogmouths, Eastern Water Dragons and Australian Water Dragons that frequent this garden area.
- Section 3.3.1 on p.30 Table 4 mentions only one tree hollow. Photos on p.12 (two pictures) clearly show two different trees having hollows and Table 7 on p.33 says 3 hollows on site (Tree 90 has one hollow and Tree 75 has two hollows). This continues to show the inaccuracies in this report.
- Table 7 on p.33 looks at the potential occurrence of the Bush Stone-curlew, noting habitat constraints and a justification for saying there is no potential as there are no dead trees on the subject site. This is FALSE as Tree 93, *Pittosporum undulatum* being 10m tall is dead on No.17 Balfour Street, and No. 10 Highfield Road has two dead trees on it and is adjacent to the proposed development.
- Table 7 on p.36 only looks at the Long-Nosed Bandicoot endangered population in inner western Sydney. But has failed to identify the equally endangered population at North Head in Manly LGA Sydney (<https://threatenedspecies.bionet.nsw.gov.au/profile?id=10589>). The Southern Long-nosed Bandicoot (*Perameles nasuta*), is currently undergoing a Consultation on Species Listing Eligibility and Conservation Actions by DCCEEW, as populations face increased threats. These Bandicoots only live up to 2.5 years in the wild and live solitary lives unless mating. Currently, member/s of this species has been sighted in the backyard of 14 Highfield Road adjoining this proposed development. It is only logical that the bandicoot also hunts in the adjacent backyards forming part of the green corridor as it forages for food. Taking away this habitat by developing adjoining Balfour Street will displace this scarce population in this part of Ku-ring-gai. Closest known populations are found kilometres away in Roseville Chase National Park. Construction activity including vibration from digging will result in its displacement from its safe haven here.

Sightings (photos and video footage of *Perameles nasuta*) has been reported to both Nature Mapr (<https://naturemapr.org/>) and NSW Government Environment Line. I reported the sightings of Bandicoots to ACS Environmental when they visited my backyard in 2025. I also included photos taken of them in 2025 in my objection to 19-25 Balfour Street development. Recent photos of the Southern Long-Nosed Bandicoot are included here:



Above Photographs: *Perameles nasuta* – Southern Long-nosed bandicoot, taken by trail camera at 14 Highfield Road (2025-2026).

- Table 7 on p.37 says a targeted search in the form of a “random meander” was used to try and identify any populations of listed species on this page. A “random meander” is NOT a targeted search!
- Table 9 on p.40 says a targeted survey was used to determine if certain fauna was present – I argue that one short visit for a few hours during the daytime is insufficient to determine if they are present. Most native fauna are foragers and have a range of hunting grounds they rotate through according to season. They may have been present in adjacent properties at the time they visited. Nocturnal fauna would not be present during the day.
- 4.2.2 p.43 Threatened Fauna – Long-nosed bandicoot. The search for signs of these was not completed properly. They forage in adjoining properties and go under fences to gain access to additional ground. I provided photos of both pathways through my garden made by Long-nosed bandicoots, holes under fences where they travel between properties in this STIF (Sydney Turpentine-Ironbark Forest – a critically endangered community in Sydney). ACS Environmental noted the signs of the conical holes left by Bandicoots in my yard in their report on 19-25 Balfour Street, which has been completely ignored for 9-17 Balfour Street which is immediately adjacent.



Above Photos: Left to right progressive pictures showing bandicoot corridor along adjoining back fence between Balfour St properties and 14 Highfield Rd photographed by D. Palmer.

- 4.2.2.1 on p.43 Bats. They should have re-positioned the recording devices to try and obtain a better recording for identification purposes. Not doing so is simply lazy and makes this report lacking in objectivity. Moving the recording devices closer to known habitats could have also been done to further prove or disprove what is present. Not to do so is very poor.
 - Table 10 on p.44 does not list the *Miniopterus australis* (Little Bent-wing Bat) and *Saccolaimus flaviventris* (Yellow-bellied sheath-tail Bat), both vulnerable bat species that were identified as having potentially been recorded at 19-25 Balfour Street by ACS Environmental when they completed their report for that development. If they were potentially found in an adjacent property it is highly likely that they would also exist at 9-17 Balfour Street as well.
- 4.3.1.1 on p.44 Table 11 summary of trees to be removed, does NOT include the trees at the front of 11 and 15 Balfour Street. Of these, two are 18m tall – very mature; four are 26m tall – really mature and one is 12m tall. This is removal of a VERY significant number of mature native trees. 10 in total which is UNACCEPTABLE. Replacement trees would take a very long time to reach these heights with replanting. Far better to design around significant trees which is achievable here.
- 4.3.1.2 Tree 75 (Sydney Blue Gum) has hollows and should NOT be removed. Trees with hollows are protected.
- Table 12 on p.48 – Movement of threatened species required to maintain life cycles – says no living canopy trees will be removed. This is NOT the case as p.44 lists 10 trees to be removed!
- P.49 Development and removal of Native trees will further reduce population of birds, bandicoots etc that inhabit this area. Therefore, this development should NOT be approved.
- 4.3.4.1.1 on p.49 states “*The Sydney Turpentine-Ironbark Forest in the Sydney Basin Bioregion Ecological Community is listed as serious and irreversible impact (SAIL) entity in the Guidance to Assist a Decision Maker to determine a Serious and Irreversible*

Impact based on principles 1 and 2. Therefore, there should be NO development in this area of the Balfour Street/Highfield Road HCA. The Report also goes on to state that the subject site is associated to a “*Critically Endangered Ecological Community (CEEC) under the BC Act*”, yet this report concludes it is acceptable to destroy it. The report is referring to: Sydney Turpentine-Ironbark Forest (PCT3262).

- Table 13 on p.50 The proposal has NOT been developed or designed in such a way that limits the clearing of mature canopy species. Ten very large trees are going including the Turpentine trees at the front. This is NOT insignificant.
 - Last row in table says: “*use existing building footprint*” – this is NOT so as 890m² of Native Vegetation is being demolished.
 - P.51 first row – states “*9 out of 16 mature canopy species (>10m tall) will be retained.*” However, seven trees will be removed - two are 18m tall – very mature; four are 26m tall – really mature and one is 12m tall. A total of 67 trees will be removed. This is NOT insignificant losses.
 - P.52 last row – “*2021 – recovery plan being prepared by NSW Department of Environment and Heritage – suggested prevention of further clearing.*” Clearly these plans do NOT align with this recovery plan.
 - P.54 last row ii – “*small area of proposed development....minimal loss of potential connectivity*” – NOT small, it is significant. The percentage of loss is between 16 and 18% in an area where surrounding streets do not have the potential for any such loss, means that development can and should be better located.
- Conclusion on p.57 states: – “*Site has been mapped as having significant biodiversity value*”. Therefore, the only correct conclusion is that this site and the adjoining site should NOT be developed!
- The following fauna species has NOT been mentioned in the report, yet are present in this Biodiversity site:
 - Ringtail Possums (*Pseudocheirus peregrinus*);
 - Southern Long-nosed Bandicoot (*Perameles nasuta*);
 - Brush Turkey (protected) (*Alectura lathami*);
 - Eastern Banjo - Pobblebonk Frog (*Limnodynastes dumerilii*);
 - Peron’s Tree Frog (*Litoria peronii*);
 - Australian Water Dragon (*Intellagama lesueurii*);
 - Eastern Water Dragon (*Eulamprus quoyii*);
 - Skinks and Lizards including Blue Tongue;
 - Tawny Frogmouths (*Podargus strigoides*);
 - Grey Butcherbird (*Cracticus torquatus*); and
 - Australian Raven (*Corvus coronoides*).
 - (last two were detected by ACS Environmental at 19-25 Balfour Street).

The provision to use Biodiversity Offsets are immaterial. Once the environment has been destroyed, it is lost forever. Far better to recognise the loss of a highly significant biodiversity corridor and maintain and enhance it than destroy it. This development and the one adjoining it should both be rejected.



Above photographs - left: Eastern Banjo Frog and right: Peron's Tree Frog both photographed by D.Palmer at 14 Highfield Road Lindfield.



Photos above: Some of the images provided on 3 April 2024 to ACS Environmental (D.Palmer).



Photos above: Left – Brush Turkey, taken by trail camera at 14 Highfield Road on 5 September 2025; Right – Larger garden skink taken by D. Palmer at 14 Highfield Road on 16 February 2026.



Photos above: Australian Water Dragon photographed by W. Palmer at 14 Highfield Road on 19 November 2025.

Appendix 10 – Arbicultural Impact Appraisal

- P.2 states: *“Five high category trees and sixty-two low and very low category trees will need to be removed due to this proposed development. However, most of these trees are not readily visible from any prominent public viewpoint and the retention of the important tree cover to the rear of the property will ensure there is little impact on the wider setting and minimise impact to the heritage item to the rear.”* This position is disputed due to the following:
 - The trees can be seen from Highfield Road which is a public place. Presumably they can also be seen from the Church and the School – including the Playground.
 - Visibility from public viewpoint is NOT the sole consideration. Visibility from adjoining properties needs to be also considered as this is changing and not for the better.
 - The so-called important tree cover to the rear of the property is affected by the removal of the following trees (regardless of what they are as their removal affects the canopy) which will affect neighbouring views and affect the green corridor that exists at the rear of ALL adjoining properties in Highfield Road/Balfour Street. These trees are all within the TPZ of other retained trees – Trees 93,91,75,59,55,54,52,18.
 - The canopy will also be further reduced by the necessary removal of 2 Category A trees within the new building footprint – Tree 48 and 83.
 - Even though some of these are considered pests or weeds, their size within a HCA (Heritage Conservation Area) makes them significant. Normally Celtis are NOT allowed to be removed if seeking Council permission as a “normal” tree maintenance activity within a HCA. If coupled with a DA it is viewed differently. (See Ku-ring-gai Council’s Tree Assessment Guidelines). Actually, wild birds e.g. Cockatoos and Rainbow Lorikeets feed on the seeds of the Celtis. This food

source should be replaced by trees that provide other sources of food for the birds.

- The following are rated as Category A1 trees meaning they are significant and worthy of being a constraint, yet the driveway for the development was placed right where they are instead of locating the driveway at the lowest point to avoid this impact:
 - Tree 3 *Alectryon coriaceus* 12m tall (rainforest tree) grows in sheltered moister forests see (<https://connected.pmhc.nsw.gov.au/bloged/native-plant-of-the-month-alectryon-coriaceus/>);
 - Trees 68 and 69 *Melaleuca quinquenervia* (Paperbark) both 18m tall. According to the Australian Native Plant Society these usually grow along watercourses and swamps, indicating the type of sub-layer soils below this site. This is confirmed by the high-water table occurring onsite in the geotechnical reports.
- There is more than adequate space between trees 85 and 69 to locate the driveway for this development and save these Category A1 trees. How come the building design did not take the tree classifications and importance into account when designing the location of the driveway? What other important factors have also been summarily dismissed?
- There is also no reason why the following trees should not be retained:
 - 66, 67, 85 are Camelias, (66 sasanqua 6m tall; 67 sasanqua 10m tall; 85 japonica 5m tall); are all within the front set-back and can be retained along with 3, 68 and 69 if the driveway is correctly relocated. Camelias are part of the local character of Heritage Buildings and homes in Lindfield. Their maturity and size make them instant features.
 - 7 and 8 are camelia japonicas (5m and 4m) on boundary within set-back and therefore can and should be retained.
 - 65 is a crepe myrtle and is within the front set-back and should be retained.
 - Tree 85 a camelia can be retained as part of the new front garden. It's retention would help "settle" the new build quicker into the environment than having to wait for new plants to grow.
 - 64 is a Jacaranda mimosifolia and is also within the front set-back and should be retained. Tree 59 is also a Jacaranda mimosifolia and whilst only 4m tall is part of the rear forest of trees and should be retained. Removal of this could disturb roots of nearby retained and important trees. It is not in the way of the building and well within the TPZ of other mature trees. There is no good reason to remove this tree. 4m in height is a great start to help replacing a part of the canopy which is being lost through the removal of over 40 trees in the building footprint. (67 trees are planned to be removed in total).
- The new building footprint does NOT match the existing buildings footprint as stated on p.50, this is very obvious from the sheer volume of trees in the rear of the properties being removed. The new footprint even extends into TPZ zones. The digging and piling needed to build will further extend into these TPZs, and thus compromising the health of these trees.

- There is a gross INCONSISTENCY in tree treatment. Trees 3 and 4 are the same species - *Alectryon coriaceus*, both are 12m tall. Tree 4 is being retained – it is larger in trunk and age is Mature (M). Tree 3 is being removed but is smaller in trunk and age stated as Overmature (O). It would be logical to classify the larger trunk as being Overmature than the smaller trunk – smaller trunk normally means it has further growth potential. This does not make sense. Has Tree 3 been deliberately labelled “O” so that it is ok to remove?
- The street Council lawn level is being changed, and the soil level drop will adversely affect Tree 4 by exposing normally covered roots. Tree 4 is a Category A1 tree worthy of being a constraint. This consideration has been completely ignored.
- No where in this report does it mention that the landscape of the existing four homes is part of a Heritage Conservation Area. Ku-ring-gai’s amended KLEP 2015 currently still recognises this status.
- Errors in Appendix 2 Tree Schedule:
 - Tree 53 is not shown as belonging to a neighbour;
 - Tree 56 is not shown as belonging to a neighbour (but 57 is);
 - Tree 86 is either in the neighbours’ place or on the boundary – this is not indicated as such in the table.
- Tree 75 has two hollows in it however this importance is not saving this tree. Whilst it is in poor condition, there are things that can be done to help it. All trees with hollows are important for wildlife. If it has to be removed, the hollows should be relocated on this site, not moved to Paddy Palin Reserve. Anything living in it has chosen this area away from other colonies and their competition.
- P.16 – Section 6.2 – My response: The developers have NO rights to threaten removal of trees on other properties adjacent to the development. They do NOT own these trees. Tree owners (custodians) do NOT have to allow any trimming beyond the removal of deadwood which is their responsibility. Tree rules and responsibilities are clearly specified on Council’s website. This document is NOT stating facts and is actually inciting threats to neighbours’ trees (and Council owned trees). ALL trees require maintenance – including the new ones intending to be planted as listed in the Landscaping Plan. This is NO different for those trees in neighbouring properties. It is a risk of choosing to live with trees, which goes hand-in-hand with choosing to live here in Lindfield (Ku-ring-gai).

The conclusion from the analysis of Appendix 10 – Arbicultural Impact Appraisal, is that it should not be accepted as it contains too many errors and inconsistencies.

Appendix 22 – Landscape Plan

The following are INCONSISTENCIES with Appendix 10 Arbicultural Impact Appraisal:

- Tree 11 according to Appendix 10 is to be retained, as it is in Holy Family Primary School’s yard, yet Appendix 12 of the Landscaping Plan p.3 (Existing Tree Schedule)

says it is to be removed. Tree 11 does not belong to the development. This is WRONG. All documents should collectively be consistent with their facts. This error was found within 5 minutes of reviewing the Landscape Plan – how many other errors exist?

- Tree 51 – Appendix 10 says retain, but Appendix 22 says remove.
- Tree 83 – Appendix 10 says remove, but Appendix 22 says to retain – how? This tree is in the middle of the new building! This tree is an A1 tree categorised as Important, which means suitable for retention, however Appendix 22 says it has “low” significance. There is a real need for consistency between documents.

Insufficient Deep Soil – proposed 23% does NOT meet the requirement.

- Part 7A.6 Control 1 – For sites over 1,800m² the DCP requires at least 50% of the site to be allocated as deep soil landscaping. The intent of this requirement is to contribute to Ku-ring-gai's distinctive garden character, support urban biodiversity, and enable effective stormwater infiltration and tree planting.
- Part 7A.6 Control 2 requires deep soil zones to be configured to retain healthy and significant trees on site and adjoining sites.
- Part 7A.6 Control 7 requires minimum tree replenishment and planting across the site. Lots greater than 1,800m² are required to support one tree per 300sqm of site area or part thereof capable of attaining a mature height of at least 18m on shale, transition soils and 15m on sandstone derived soils. Quantity of trees has been met.
- Deep soils however are needed to ensure proper and large growth to replace the canopy cover lost by development. Deep soil area of 23% will not achieve this.

Planting schedule deficiencies:

- Does NOT include any *Melaleuca quinquenervia* (Paperbark) replacements for the 2 (Trees 68 & 69) highly significant A1 trees planned to be removed.
- Also, NO replacement for Tree 3 *Alectryon coriaceus* (Rainforest Tree) which is also an A1 highly significant tree being removed. A1 trees are worthy of being a constraint.
- Other Native trees that existed and are NOT being re-planted include:
 - Trees 93 and 43 (*Pittosporum undulatum*) Native Daphne;
 - Tree 83 (A1 category *Phoenix canariensis*) Date Palm;
 - Only ONE *Eucalyptus saligna* (Sydney Blue Gum) is planned to be planted, when four (Trees 75, 91, 48 and 50) are being removed.
- This area is part of a remnant STIF (Sydney Turpentine-Ironbark Forest) and Sydney Blue Gum Forest, yet only one of the typical trees found in these environments has been included in the planting schedule – Smooth Barked Apple (*Angophora costata*).
- Other tree species typically found in STIF that should be included in the planting schedule are:
 - Turpentine (*Syncarpia glomulifera*);
 - Grey Ironbark (*Eucalyptus glomulifera*);
 - Blackbutt (*E. pilularis*);

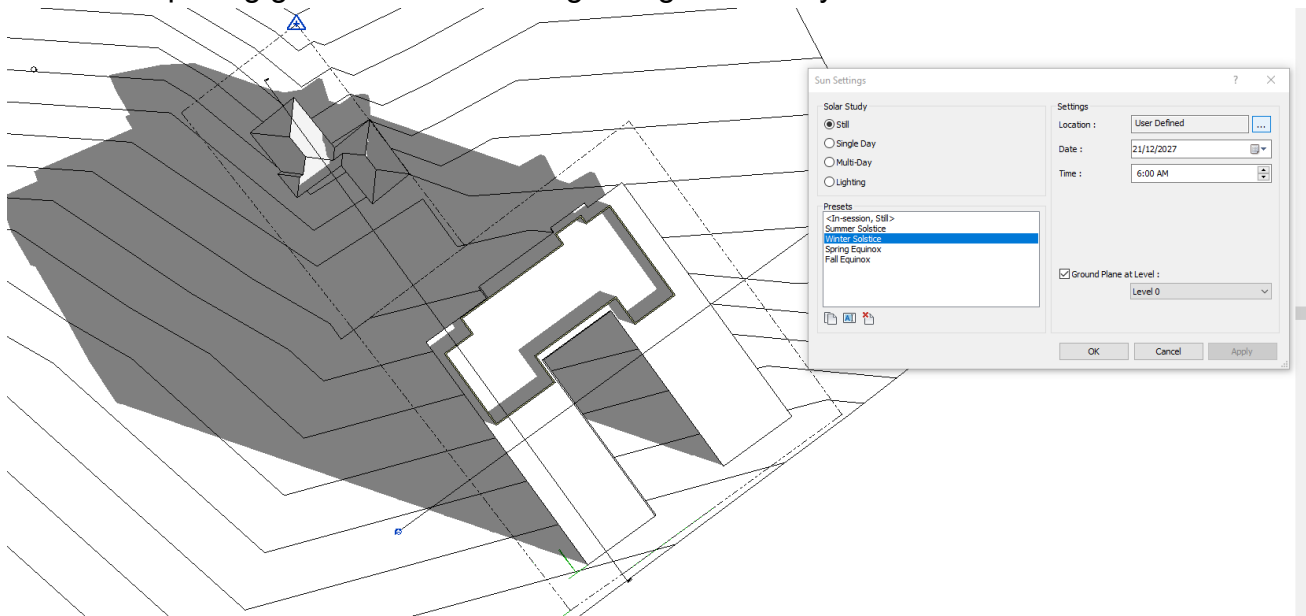
- Grey Gum (E. punctata);
- Even a Native rainforest tree existing in neighbouring properties – a Toona australis could have been planted.

Omissions from the Landscaping Plan include:

- Ponds for native frogs.
- Bird Baths to provide water for native birds.
- Play areas for children – there is only seating to look at the garden.
- BBQ areas for families to use.

Appendix 5a – Architectural Plans

- Inadequate building setbacks do not meet the KLEP or ADG (Apartment Design Guide). Should be 10m at front but plans only allow 6m. When adjacent to a Heritage Item or a Heritage Conservation Area (HCA), increased setbacks are required, and these have not been met. The side setback near the school playground appears to be only 3m for most of the length.
- P.37 - Inadequate solar access to units: 17 get no solar access in winter; 34 units have less than 2 hours per day. Solar access has only looked at winter solstice on a building height of 28.6m. This development will stand at 33.2m, thus the shadow diagrams are incorrect and should not be relied upon. No consideration of the shadow impacts in summer depriving gardens from morning sunlight that they are used to.



Above diagram: Summer Solstice at 6:00am on 21 December, showing shadows over properties in Highfield Road Lindfield.

- P.40 Ventilation Compliance Diagrams shows 21 units have no cross-ventilation and will need to run air-conditioning constantly. These units also run the risk of becoming home to black mould as a result.

- Whilst ADG stipulates minimums, good planning should well and truly exceed these. No-one would choose to live in poorly lit, poorly ventilated units. This creates barriers to sell them, and they may become unoccupied for extended periods or never sell. Surely this is not the intention.
- Exceeds height restraint of 28.6m by 4.6m, standing at a finished height of 33.2m. Nothing has been documented in the report of how our summer morning sun is affected. Our gardens will be in the dark until after midday and plants and trees relying on the morning sun for their health and benefit will be missing, along with our mental health benefits.
- Impact of the neighbouring planned development in terms of solar access has not been considered.
- Diagram on p.8 clearly shows that the new building will block cool southerly winds in summer from reaching No.s 6 and 8 Highfield Road, thus increasing the temperatures endured by these properties. (Site Analysis).
- P.11 – Lower ground floor. Building was not designed around significant trees – if driveway entrance was located at the lower point as suggested in the Urban Design Report, then 3 significant trees could be saved (“A1” Trees 3, 68 and 69). The Architectural Design ignores this and destroys these trees: a Rainforest tree of 12m and two Paperbarks of 18m tall. A1 rating means worthy of being a constraint.
- P.13 – Level 01 Plan - SE (Southeast) corner (right-hand side from street) says both “9M SETBACK & 6M SETBACK” (in blue), right next to each other. It CANNOT be both. Which is correct? Elsewhere on same diagram in red it says 6m. What other errors/omissions/inaccuracies are there in these plans? Same error is on P.14.
- Elevation – Sheet 1 – East Elevation p.23 clearly shows building floor 9 – roof top residence and plant exceeds height plane permitted. Also p.33 Building Height. Again Elevation – Sheet 2 – West Elevation p.24 shows plans exceed height plane permitted.
- Section 03 p.28 seems to show a sub-terranean unit. My understanding is that these are not permitted in the ADG.
- P.39 Shadow diagrams clearly show that the reserve between Balfour and Bent Streets will be completely in shadow from 1pm onwards in the middle of winter and this is only based on 28.6m, not the actual height of 33.2m so the actuality is far worse. Also, from 3pm the new gardens of the low-rise in Bent Street will also be in shade – restricting their solar access.
- P.38 Sun Eye View Diagrams are all presented from different angles. This is deliberately misleading as each different angle only shows where the minimum shade falls at each time slot. Doesn't show the maximum or true effect.

The only conclusion one can draw from the Architectural Plans is that they are so poor they should NOT be accepted.

Appendix 27 – Social Impact Scoping Study

- This study on p.6 Figure 2 does not recognise the completion and opening of the second largest Coles in the southern hemisphere with apartments above it in April 2025 well ahead of the completion of this report in October 2025, yet the figure refers and shows this as it was prior to this development.
- In the block which this development is sited – bounded by Pacific Highway, Balfour Lane, Balfour Street, Bent Street, Wallace Parade and Highfield Road – contains the following:
 - Holy Family Catholic Church;
 - Holy Family Catholic Primary School;
 - Ready Steady Go Kids Lindfield;
 - Electricity Sub-Station;
 - Coles store and apartments; and
 - Highfields Preparatory & Kindergarten School (this is not shown but should be for completeness in understanding the surroundings in their full context).
- Figure 3 on p.9 - Blue shaded social impact study does not include the Church, Coles Store and apartments and Highfields School as listed in the previous bullet point above and therefore the context setting of this study is INCOMPLETE.
- P.14 quote: *"It is envisioned that the people of Greater Sydney will live within 30 minutes of their jobs, education and health facilities, services and great places"*. Whilst this may be a "vision" it is so far from reality it is not funny. I know of only a few people that satisfied being within 30 minutes of work prior to COVID 19. Working from home helps this vision, however recent times have seen the trend to return to the workplace. It is well-known that the majority of people will have more than one job in their lifetime. People will go and accept jobs they can get (employment is now more difficult than ever to find a job) necessitating additional travel away from the residence. People are not going to move to be within 30 minutes of work every time they change their job. That is an unrealistic expectation and adds additional affordability issues with stamp duty and moving costs to consider as well. This is thus an UNREALISTIC assumption. An easy example here is the number of commuters using the train from Central Coast/Newcastle coming into Sydney for work EVERY DAY!
- Table 1 – Reducing Carbon emissions – what about continued use of Air-conditioning for the 21 units that are not naturally ventilated in this development?
- P.14 – North District Plan – Priority N5 – housing choice. I want to live in a free-standing heritage house within walking distance to the station. These are being replaced with high-rise. Therefore, MY CHOICE is NOT being met. There is no longer a mix of housing types within walking distance to the Station – only apartments. Therefore, choice has been removed. Thus, planning priority N5 is NOT met.

- P.14 Planning Priority N6 – respecting heritage – a 9/10 storey building right next to a Heritage Item and wiping out part of a local Heritage Conservation Area containing contributory items is NOT respecting heritage. It is destroying it.
- P.14 My understanding is that the environment was to be considered – it is NOT listed in the extract from the North District Plan – clearly the environment was NOT considered a priority in this study, which has a GREAT impact on people’s wellbeing that currently live in the impacted zone and have no intention of moving.
- P.15 – Ku-ring-gai 2032 Community Strategic Plan:
 - Theme 1 – “Respects our history”. This is NOT happening here as this project destroys history in a Heritage Conservation Area.
 - Theme 3 – “Enhance our natural environment” – how is replacing a wildlife corridor with concrete enhancing the natural environment?
 - P1 – Preserving Ku-ring-gai’s Character – this project is not – it is destroying it!
 - P5 – Heritage is protected – it is not protecting it – it is demolishing it!
 - KLEP 2015 – designed to Manage Biodiversity – yet this project and the neighbouring one at 19-25 Balfour Street will DESTROY the wildlife (flora and fauna) corridor that exists in the deep backyards of this precinct.



Above diagram – snapshot from Google Maps with green outline showing the Native flora and fauna corridor existing at the rear of houses in the Balfour Street/Highfield Road HCA.

- P.17 Part 2 first bullet point – *“Protect and conserve the prevailing Ku-ring-gai landscape character by retaining areas of detached housing within garden settings on large lots, including tall canopy trees.”* NOT occurring with this project. Therefore, NOT achieved.
- P.17 Part 2 eighth bullet point – The North District Plan in the Housing Section of Ku-ring-gai’s LSPS (Local Strategic Planning Statement (2016-2036)) was

developed to inform the Housing Strategy and includes: *“In considering areas for future medium and high-density housing forms, the following areas are to be avoided:*

- *heritage conservation areas*
- *areas of visual and aesthetic quality and character*
- *areas of intact tree canopy where the built form does not sit under the canopy*
- *areas with environmental values”*

This development does NOT avoid these areas. 9-17 Balfour Street satisfies ALL these areas. Therefore, this development should NOT be approved.

- P.17 Part 2 Liveability B: Local Character and Heritage – second Bullet point:
 - *“Retain appropriate setting and visual curtilage to Heritage Items and HCA’s”* – this project does not achieve this – it DESTROYS this.
 - Ecological values are NOT protected with this development.
- P.19 Housing Priority H2 – Encourage diversity and choice of housing – Objectives – first bullet point – *“to encourage a mix of dwelling types and sizes”*. This is NOT achieved by replacing ALL free-standing dwellings within 800m of the station with different sized apartments – this is NO choice. The only choice is apartment A or apartment B you cannot choose a free-standing house as none are planned to exist – this removes choice of dwelling types.
- A healthy neighbourhood has green spaces and trees. This is being seriously reduced.
- Section 7 p.21 Issues with Social Impact Scoping Summary:
 - Way of Life - Diverse and affordable housing. Potential impact has been classified as a Very High Positive, however this has been over classified as *“Affordable housing in Lindfield may not be affordable if eligibility is assessed on market rent”*, which it logically has to be.
 - Residents affected by this development in Highfield Road were NOT considered or consulted.
 - Not all residents will use public transport.
 - A lot will drive and a lot will park cars on streets.
 - Traffic – Potential Impact has been classified as Low Negative, however it is inevitable that this development and others will increase traffic movements in this area and just because there is a train station nearby does not mean it will always be used in preference to a car, therefore this should have been classified as a HIGH negative. In addition, outside traffic coming to shop at Coles was NOT considered.
 - Impacts to Location – does NOT consider surrounding schools; Church (services, mid-week funerals etc); Coles Supermarket – already lots of people drive into Balfour Street to shop there adding to the traffic. It is a positive, but not highly positive.
 - Social Infrastructure – Negligible?

- Communal residential spaces – outdoor seating in garden – Is this enough? What about places for the children to play? BBQ facilities etc?
- Hornsby Hospital is a long way by car from Lindfield and NOT easily reached by Public Transport – hardly a positive.
- Providing apartments provides for families. Families have children, children need schools. This has NOT been factored in. Thus this CANNOT be rated as a negligible impact.
- Surroundings Health & Wellbeing – this has been classified as negative when it should be HIGHLY negative.
 - People who own houses in Highfield Road have NO intention of selling. Therefore, it WILL NOT be developed.
 - States there is not potential for overshadowing of Highfield Road - Highfield Road will be overshadowed as these people are staying in their existing houses.
 - Does not mention Highfield's Preparatory & Kindergarten School.
 - Did NOT engage with property owners in Highfield Road for consideration at all. No Letterbox drops were received, no advance plans or consultation. No-one on Highfield Road was contacted.
 - Removal of trees impacting biodiversity is HIGHLY negative not just negative.
- Decision making Systems/community should have been rated HIGHLY negative not negative. Highfield residents were NOT consulted in any way.
- Section 7 has thus arrived at an incorrect conclusion. All of these assessed Social Impacts are mostly NEGATIVE if assessed objectively and properly.
- Whilst this proposal falls within a TOD precinct, it still must RESPECT heritage and fit in. This proposal DOES NOT fit in!

Appendix 28 – Transport Impact Assessment

- P.8 (and later again in Table 2.1) says this development is located approximately 350m walking distance from the Station, this is in contrast to other documents stating it is 400m and 380m from the Station! Just how far is it? All documents should be clear and consistent on basic facts such as this.
- 2.1 – Aerial photograph only shows Pacific Highway and Balfour Street. Omitted is Bent Street, Wallace Parade and Highfield Road which are ALL affected by this development. Thus, context is not being presented clearly and objectively.
- 2.2 – zoning – omitted is that the land under KLEP2015 is also a HCA (Heritage Conservation Area).
- 2.3 – Balfour Street is a narrow road. Traffic can only just pass each other when cars are parked on both sides. This is not mentioned. Road width is narrower than Highfield Road.

- Section 3.0 on p.11 – proposal states it is 9 stories – other documents state 9-10 stories. It is actually 10 stories tall in parts and exceeds the height limit of 28.6m by 4.6m, standing at a finished height of 33.2m.
- Table 4.1 on p.13 – Car parking spaces:
 - Affordable – just because someone needs an affordable house, does not mean that they will not have a car.
 - Based on 2021 ABS Census data for Lindfield, NSW, high-density housing makes up a significant portion of the area, and car ownership remains high despite the apartment density. The average number of motor vehicles per dwelling in Lindfield is 1.7.
 - According to 2021 ABS Census Data, 91% of Australian households have at least one car, with 55.15 owning two or more. In greater Sydney, 84.2% of households own at least one car, with only 10.8% owning none.
 - Car ownership in Ku-ring-gai according to ABS statistics is very high compared to the Greater Sydney average. Car parking spaces provided in this development do not reflect the ownership statistics according to the ABS for people living in Ku-ring-gai. 93.5% of people living in Ku-ring-gai own one car, whilst 41.1% own two and 17.4% own three or more. Therefore, car parking spaces provided on-site are INADEQUATE.
- Inadequate parking spaces results in constant parking on the street and surrounding streets. When combined with inadequate parking available in other nearby developments, this will mean loss of parking for other people visiting the area, or the ability for commuters who live further away the loss of ability to “park ‘n’ ride” to work. Or people to park on Sundays for Church services or funerals during the week. Therefore, the SEPP Car Parking Requirement is inadequate. This is something the Transport Impact Assessment should have taken into account.
- Section 4.2 on p.13 says proposed development will provide 181 car parking spaces, however p.10 says 182 car parking spaces will be included! Which is it? 181 or 182? INCONSISTENT!
- Out of 181 car spaces, 161 spaces are for permanent residents, and 20 spaces are for visitors. This makes the car parking spaces available per dwelling for residents even worse. At a rate of 1.7 cars per household (ABS ownership statistics) equates to a minimum need for 206 car parking spaces. No car sharing spaces are provided despite SEPP Requirements stating these must be at a rate of one per 90 dwellings. Thus, this development does NOT meet SEPP.
- Section 1.3 references p.6 but does not include ABS Census Data.
- Car parking spaces provided are standard parking sizes of 2.4m wide and 5.4m long. Whilst this meets the requirements, it is short sighted, as these measurements are too tight for larger vehicles. Larger vehicles will end up having to be parked on the street.
 - The space provided for cars to park will not accommodate SUVs or 4X4s, thus anyone in these units owning such vehicles will have to park them on the street.

“Based on 2021 ABS Census data and related regional analysis, car ownership in

the Ku-ring-gai Council area is very high, with a strong concentration of larger vehicles like 4WDs and SUVs compared to the Greater Sydney average."

- SUVs and 4x4s require a 3m width and a 6m length to comfortably accommodate the parking needs of these vehicles.
- P.15 – spaces provided do not cater for increased ownership of SUVs and 4x4s vehicles.
- Table 5.1 is based on a 2004 assessment – it is now 2026, and so this is 22 years out-of-date!
- Section 5.4 says that car parking layout is satisfactory – however the above points clearly show that these plans are inadequate – they were based on out-of-date data.
- Section 7 – Traffic Impact of 121 units:
 - AM Peak hour = 23 vehicle trips
 - PM Peak hour = 18 vehicle trips (however p.22 says 19 – inconsistent)
 - Daily 184 vehicle trips
- Section 7.3 paragraph 2 – Other SSDs in the area will send traffic into and out of Balfour Street due to the Coles shopping centre car park entrance and exit is located on Balfour Street. This aspect has been completely IGNORED. Therefore, this traffic WILL affect the performance of the intersection (Corner of Balfour Street and Pacific Highway).
- Section 7.3 paragraph 5 – *"majority of traffic...would be residential in nature"* – what about the following which has not been considered:
 - Delivery trucks (groceries from Coles) – nothing has been factored in as to how people living in these apartments are going to get their weekly groceries. It is unrealistic to expect that they will walk and carry a lot of grocery bags either in one trip or several trips every week. It is more likely they are either going to drive or get home delivery. This equates to a lot of truck movements in Balfour Street probably the equivalent of one per unit per fortnight at least;
 - House Cleaners;
 - Waste Services;
 - Rubbish removal – e.g. old furniture, fridges etc.;
 - Vehicle services e.g. NRMA, mobile mechanics, or taking the car to be serviced elsewhere which will be at least one service per car per year and more if repairs are needed;
 - Transport of children to sporting events;
 - Social outings;
 - People moving in and out of the apartments – furniture moving etc;
 - Visiting Relatives. All additional movements other than people going to and from work.
- Consideration must be given to other residents in Bent Street including development projects increasing population and thus cars. One can only turn left from Bent Street at the Pacific Highway. If Bent Street residents need to turn right at the Highway they are going to use Balfour Street.
- Ku-ring-gai Council plans to close Bent Street at the Pacific Highway when the Lindfield Village Hub is developed. All Bent Street traffic will then use Balfour Street. Thus 7.3

did not look properly at the wider context or the future uses of surrounding streets. Therefore, the report and analysis is very INACCURATE and short-sighted.

- Section 7.3 on p.18 - It is an unrealistic assumption that people will vary their arrival/departure times because of heavy school traffic. If they have somewhere they must go to at a designated time, they will have to leave the premises at a time that will allow them to arrive on time. This may necessitate them leaving during the peak school zone times. Our observation of people (younger generation) is one of impatience and disrespect – they will go and do when they have to with little or no regard for those around them.
- Table 7.2 does not include the known intended re-development of the retirement village, which is in Balfour Street through to Bent Street. Thus, the accumulated traffic generation has not been calculated correctly.
- P.20 shows the following: Pacific Highway/Balfour Street intersection operating with a degree of saturation (SoS):
 - 0.76 during AM Peak (good). Poor = 0.90.
 - 0.70 during PM peak.
 - However, because they have not factored other developments (Lindfield Village Hub, surrounding SSDs and the retirement village) and others further away not immediately in the vicinity that would shop at Coles, the estimates are GROSSLY under the expected actual.
 - It is highly likely that this intersection will reach a DoS of over 0.90 in the very near future, even if 9-17 and 19-25 Balfour Street developments do not proceed.
 - As a result of the busy nature of this precinct, NO developments on this block should occur at all.

Appendix 30 – Urban Design Report

- P.5 says site is 380m from station. This differs from two other reports. One says 400 another says 350!
- P.5 says “Conservation” area but does not correctly list it – it is a Heritage Conservation Area.
- P.5 does not say how it affects HCA properties to the Northwest. These properties are very close to the development and should have been considered regardless of the HCA.
- Urban Design Report ignores the High Biodiversity Value that exists at the rear of the subject properties. Clearly this is known as a Biodiversity Value Map is included on p.7, as is the KLEP2015 Heritage Map, which clearly shows the Balfour Street/Highfield Road HCA (c29) as being a complete section bounded by roads and well removed from other HCAs making this important to save especially given the HCA’s importance.
- Urban Design Report does not consider the narrow streets (especially Wallace Pde which is effectively a one-way street), nor the practicalities of developments further away that will impact this area to function because there are two schools, a Church, very

large Coles store and electricity sub-station. Making this extremely busy and NO development should occur within this HCA.

- P.8 – This report was finalised in December 2025, Coles opened in April 2025, but this report does not show the Coles supermarket in the maps/diagrams on p.8.
- P.8 says correctly that the DCP and ADG says front set-backs must be 10m from street boundary. Plans have been drawn only allowing 6m, thus this project does not comply with either document.
- P.10 talks about the streetscape of “Beaconsfield Parade” – this is no where near the subject site. This is just one glaring error which should have been detected during document review. What other more impactful errors have been left in this document?
- P.10 does not show or describe the recent developments in Bent Street near Newark Crescent (Newark has been misspelt in this report) which are only 2-3 stories tall, and thus this development will overshadow and be out-of-character with these newly built homes. The proposed development will be clearly seen by these Bent Street houses, through the reserve between Balfour Street and Bent Street. With the ground level being substantially higher at the development site than the Bent Street homes, the building will appear as 14 stories not the 9/10 proposed.
- P.11 – the set-backs for the Coles (MU1 zoning) is NOT a valid reason for only having 6m set-backs at the front when 10m is the requirement. This land has been zoned R4 and therefore NO comparison should be drawn or used as a justification for the reduced set-back. It is an INVALID argument.
- P.11 points out narrow footpaths on both sides of Balfour Street. Extra pedestrian traffic will struggle to use these.
- The Urban Design Report (P.12) states that “*school drop-off and pick-up is accessed via Highfield Road*” – which is incorrect. The drive-through drop-off and pick-up operates from Balfour Street through the school to Highfield Road and queues form along Balfour Street to Bent Street during the afternoon pick-up. This is a deliberately MISLEADING statement.
- P.14 says: “*Establish a built form that responds to surrounding development*”. How can a 9/10 storey development relate to a single storey Heritage Item and a Heritage Conservation Area with single level dwellings on the blocks? Owners in Highfield Road intend to stay. How can it relate to the 2 to 3 storey new builds in Bent Street? How can it minimise amenity impacts on adjacent residential properties and the school? It is more likely that new residents in this development in apartments overlooking the school will complain about the noise from the adjoining playground.
- The Urban Design Report says: “locate primary vehicle access at the lower point of the site while avoiding impacts on existing street trees”. Unfortunately, the design does NOT achieve this. Three Category A1 trees (Nos 3, 68 & 69) which are considered highly significant are being removed for the driveway which is NOT located at the lowest point.

- How is 9-10 stories limiting building scale at the street frontage? It is a very visual impact. It cannot hide.



- P.14 also says: “*Maximise outlook from dwellings towards the street*” – this is only possible for front facing units. Rear and side units will over-look neighbouring houses and yards effectively eliminating the privacy currently enjoyed by these properties.
- Internal layouts having a high level of residential amenity – what about those units as listed earlier that miss out on natural sunlight and ventilation?
- What about considerations for the endangered STIF Sydney Turpentine-Ironbark and Blue Gum Forests that currently exists at the rear of these properties?
- P.15 now refers to 9-10 stories when elsewhere in this document it states 9 stories.
- P.15 also states a two-level basement car parking – it is actually 4 levels of car parking. See p.27 of Appendix 5a Architectural Plans.
- The FSR proposed is 3:25:1 which exceeds the KLEP plans.
- P.15 Setbacks – says front of 6m fits between eastern adjoining development (nil setbacks) and 19-25 with 8m setbacks. KLEP 2015 (amended) and ADG says frontage MUST have 10m setback. Comparing an R4 setback to an MU1 setback is INAPPROPRIATE as the requirements are different. Thus, this development does NOT comply with current rules.
- P.16 Nothing about bulk and scale here mentions that it exceeds the height restrictions imposed. Building is NOT modified for the downhill side being lower than the highest side when viewed from front. The building is the same height despite the fall cross ways and thus does not respond to the sloping topography as stated here.

- P.18 VP01 photo – says “*Existing site photograph – view from the southwest corner of Balfour Street and Highfield Road, within the HCA*”. However, this assertion is INCORRECT as Highfield Road and Balfour Street do NOT meet.
- P.18 There has been no visual impacts looking from No. 8; No 10 or No 14 Highfield Road, or from those newly developed properties in Bent Street. Thus, this analysis is lacking and INCOMPLETE.
- P.19 the solar access study has only looked at a building height of 28.6m however this development will stand 33.2m tall. Therefore, this study is inaccurate and cannot be relied upon in making any determination.
- This study only considers the winter solstice; it does not consider the impacts in summer. In winter it is clearly going to negatively affect the proposed development at 19-25 Balfour Street. In summer, the morning light (the most important for gardens and people’s mental wellbeing) will be blocked from those residences adjacent to the development affronting Highfield Road. (See shadow diagram on p.19 of this objection).
- P.20 “*A consistent street condition is achieved with the adjoining western development along Balfour Street*”. This is referring to Coles. The Setback requirements are different between MU1 (Coles) and this development (R4). Therefore, the two should NOT align at all.
- P.22 – 21 units have no cross-ventilation.
- 31 units have less than 2 hours sun on June 21.
- 10 units do not get any sun. This differs to Architectural plans which says 17 do not get any sun.
- P.22 “*All units are provided with a direct outlook*”. So much for the so-called privacy screens mentioned in the previous sentence. This means neighbours will be overlooked ALL the time. This is a TOTAL loss of privacy and amenity of those homes in Highfield Road.
- P.23 “*The amended proposal*”? This is the first exhibition; therefore, it cannot have been amended yet.
- P.23 says a total Deep soil area of 23%. Requirement of the KLEP says minimum of 50% for a site of this size. This is NOT compliant.
- P.24 talks of providing a contemporary character. This has NO respect towards the Heritage nature of the site, given it is in a HCA and is adjacent to a Heritage Item.
- P.24 mentions aluminium cladding – is this the fire-proof one? Or is it the dangerous type?
- P.24 last sentence describes the building as “*Unobtrusive*”? One can hardly miss it! It is a monolith in a side street.
- Change of footpath soil level will have a negative impact on significant Category A1 tree No.4. Soil level should not be changed from the natural down-hill progression it currently has. DCP Control 5 requires existing ground level to be maintained for a distance of 2m from any boundary. Changing the current slope will add unpleasantness to the uphill walk towards Coles.

Appendix 18a – Geotechnical Investigation Report

The following are just a few of the issues in this report:

- Section 1.4 Fieldwork Methodology and Figure 2 – Location of Boreholes:
 - Methodology implies or indicates that the geotechnical investigations covered the whole of the site, but the figure shows borehole locations covering only the eastern half of the site.
 - Given the dashed lines on the figure combined with changes in basement levels, this investigation appears to have come from a different report and a different development from that proposed.
 - No groundwater seepage rates have been recorded.

These areas need to be re-visited to include proper investigations covering the whole site.

The report is deficient in many respects in addition to the above and should be rejected.

Appendix 18b – Groundwater Seepage Analysis

Issues with this report include:

- Section 3.3 Groundwater Drawdown Prediction of water draw down is not consistent with the core of depression.
- This will induce permanent settlement of ground outside lot boundaries affecting neighbours.
- This makes development here problematic and thus this site is really unsuitable for such a development that has been proposed.
- Given that during heavy rain, a lot of “mini creeks” are formed and flow along the backs of the Balfour Street/Highfield Road HCA area towards Little Blue Gum Creek, it is not surprising that so many Native trees of the STIF and other rainforest trees occur here. One could reason that a high-water table exists in this location, and this is how this pocket of STIF survives during long periods of drought, as their root systems sit in the high-water table. Why else would Australian Water Dragons be found in our backyard?

This is highly unsatisfactory. Additional protections should be put in place to avoid this. Unless addressed, current development should be rejected.

Appendix 8 – Aboriginal Due Diligence Assessment

The Pacific Highway along Lindfield was constructed originally at the top of the ridgeline following the path of least resistance so it was easy to construct. As such it is the high point of surrounding land that flows downhill on either side.

The Aboriginal Heritage Due Diligence report for the neighbouring development at 19-25 Balfour Street, identified the site as being on a mid-slope – a ridge-line landform, which is

the correct landform given that all land slopes downhill from the Pacific Highway in Lindfield. As such the land has moderate sensitivity in terms of being associated with the occurrence of artefact scatter sites and warrants careful archaeological investigation prior to any development.

Over time landforms change in any area. Leaf litter decays and gradually forms new soil covering up old deposits including scatter remains. Then add additional soil in terms of levelling out of gardens and adding soil for new plants and it becomes highly possible under these circumstances that artefacts have been buried and thus preserved just waiting for the archaeologist's trowel.

It is recommended that test trench excavation be carried out as part of a comprehensive study to ensure that any Aboriginal artefacts or human remains are retrieved and treated with respect if this development is approved.

Appendix 19 – Heritage Impact Statement (SOHI)

The houses marked for destruction under this development proposal from 9-17 Balfour Street are each contributory properties to the Balfour Street/Highfield Road Heritage Conservation Area. Clearly an HCA would not have been created if its significance was considered not important.

The proposed development does not respect the Heritage of the area as is required. The sheer bulk and scale make it stand out vividly. It does not comply or adhere to the design principles specified in 19C of the Ku-ring-gai DCP.

The SOHI tries to redefine the Balfour Street/Highfield Road HCA by calling it "Balfour HCA". No such HCA exists on any register, and this is deliberately trying to reduce the actual footprint as forming some way of justifying this development.

A SOHI is supposed to be objective. It is supposed to explore the impacts of the development on the existing HCA. This report does not do this. It tries to claim that alterations and additions stop these properties from being contributory items. That is NOT the case.

Additions of carports, alterations to kitchens, extensions at the back would be obstacles to having these houses become Heritage Items, but that is not what is being assessed here. To be a contributory house to an HCA, is one that maintains the character of the streetscape and contributes positively to the HCA's overall appearance. All these houses do just that.



Above Photos – left to right top to bottom: No's 9, 11, 15 and 17 Balfour Street taken by D. Palmer 9 September 2025.

The loss of these houses collectively in Balfour Street would be a significant loss to the broader heritage story of Ku-ring-gai. These show what middle-class families were living in at the turn of the century and are of a dwelling type that is not well represented elsewhere in Lindfield. Currently the HCA is an in-tact group of heritage houses either Heritage Items or contributory properties that cannot be found elsewhere in Lindfield. They are akin to a row of heritage listed terraces, in that collectively these houses tell a story of early occupation close to the train station as they were originally developed in response to the opening of the North Shore Railway line and these are the houses and history being wiped out by the TOD zones. An example of this needs to be preserved. What better way than to not only save a unique collection of heritage homes but also the native wildlife corridor that exists in safety behind all these houses. A corridor that has been preserved because of the Balfour Street/Highfield Road HCA.

Ku-ring-gai Council's Objection to the development next door at 19-25 Balfour Street should be read along with this objection as it points out at length on Pages 23 to 38 the significance of the Balfour Street/Highfield Road HCA and why development within this HCA should NOT be approved.

Conclusion

In conclusion, when undertaking such important projects as this one, there is a great need to get it right. This development project should not be approved on the grounds that it has too many flaws. This project will result in the developers making money and the residents will forever live with the resultant mess.

To quote Daisy Turnbull: "*Green space and a connection to nature is vital for humans*". This is very difficult to achieve in a high-density environment and is not achieved in this development proposal.

I am against the destruction of local Heritage, and there is a great need to save the Balfour Street/Highfield Road Heritage Conservation Area, which is an in-tact highly significant collection of Heritage houses.

I very strongly object to this development.

I declare that I have not made any reportable political donations in the previous two years.

Yours sincerely,

Donna Palmer

Donna Palmer B. Bus, Quality Assurance Specialist (Retired).