



6 February 2026
Department of Planning, Housing and Infrastructure
Locked Bag 5022
Parramatta NSW 2124

To whom it may concern,

SSD-94006708 – 15-21 Cottonwood Crescent, Macquarie Park – Historical Archaeology

We refer to the proposed redevelopment of 15-21 Cottonwood Crescent, for which approval is sought under State Significant Development Application SSD-94006708.

1 Introduction

Cottonwood Development Pty Ltd (**the Proponent**) is proposing the redevelopment of 15-21 Cottonwood Crescent, Macquarie Park, NSW, legally described as SP8144, SP7630, SP7892, and SP7984 (**the subject area**) (Figure 1) to provided two new residential towers with ground floor retail. The subject area is located approximately 12.5 km northwest of the Sydney CBD, within the City of Ryde Local Government Area.

Approval for the proposed development is being sought via State Significant Development Application SSD-94006708 and concurrent Rezoning Proposal.

This letter has been prepared in response to the requirements contained within the Secretary’s Environmental Assessment Requirements (SEARs) dated 8 October 2025 and issued for the SSDA (SSD-94006708). Specifically, this letter has been prepared to respond to the SEARs requirement and government agency comments issued in Table 1 below.

Table 1 – SEARs Requirements & Government Agency Comments

Item	Description of Requirement	Section Reference
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.	This Report



This advice letter has been prepared to determine if an HAA is required in the present case. It provides a preliminary overview of the subject area's statutory context, collate visual evidence of the subject area's historical development sequence and identify the likelihood of historical archaeological resources being present on the subject site that may be impacted by the proposed development.



GDA 1994 MGA Zone 56

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Project No: P0055761

Project Manager: Aaron Olsen

■ Subject Area — Contours

LOCATION OF THE SUBJECT AREA

15-21 Cottonwood Crescent, Macquarie Park
Cottonwood Development Pty Ltd

Figure 1 – Subject Area

2 Historical Overview

The historical context of an area provides the basis for assessing what may be retained in the ground as archaeological material. The following is an overview of the historical use and development of the subject area.

European development of the area around Macquarie Park began as early as 1792, when ex-marines were granted land on the northern banks of the Paramatta River by Governor Philip (Phippen 2008). Owing to its military associations, the area was named the 'Field of Mars' after the Roman god of war. Further land grants followed and, by 1802, numerous small allotments in the area were being used for grazing horses, cattle, sheep and goats.

The present subject area was located on the northern boundary of a 570-acre grant made to William Kent Jr. in 1803 (Figure 2), immediately adjacent to the Field of Mars Common. Kent held his grant, which he named 'Tudor Farm', until 1835, when it offered for sale.¹ Tudor Farm was subdivided, with the subject area forming part of Lot 1. It was included in a wider purchase of land by D'arcy Wentworth,² who sold it to Charles Krust, a Ryde butcher, in 1891.³ Krust held the subject area during the first two decades of the 20th century and then subleased it to various individuals, described as gardeners and store superintendent between 1924 until 1934.⁴

Despite the general growth of agriculture in the surrounding area during the 19th and early 20th centuries, the subject area appears not to have been used for agriculture, or any other purpose. Aerial photographs from 1930 and 1943 show the subject area remains undeveloped and covered in vegetation, in contrast to nearby cleared allotments, until the middle of the 20th century (Figure 3 and Figure 4).

It appears that the first development and use of the subject area began in the 1940s or very early 1950s. An aerial photograph from 1951 shows approximately two-thirds of the subject area cleared of vegetation and under cultivation (Figure 5). A small area of vegetation remained in the south-western corner of the subject area, which had also been cleared for cultivation by 1965 (Figure 6). A residential building was also present in eastern corner of the subject area by this time.

The subject area underwent a significant transformation in the 1970s. By 1971 the residential building had been demolished and agriculture had ceased (Figure 7). Between then and 1978 four multi-storey residential apartment buildings were built, with associated services, landscaping and hardstand areas along Cottonwood Crescent (Figure 8). These buildings remain extant, accompanied by mature plantings that appear to date from the time of buildings construction (Figure 9).

¹ 2018, *Ironside's advertiser and Sydney price current* National Library of Australia, Canberra viewed 7 October 2025
<http://nla.gov.au/nla.obj-751367710>

² HLRV *Primary Application* 8143

³ HLRV *Volume 996 Folio 53*

⁴ Ibid



Figure 2 – Detail of undated map of the Parish of Hunters Hill from 1861, showing the location of the subject area within William Kent Jr's grant (red outline)

Source: NSW Historical Land Records Viewer

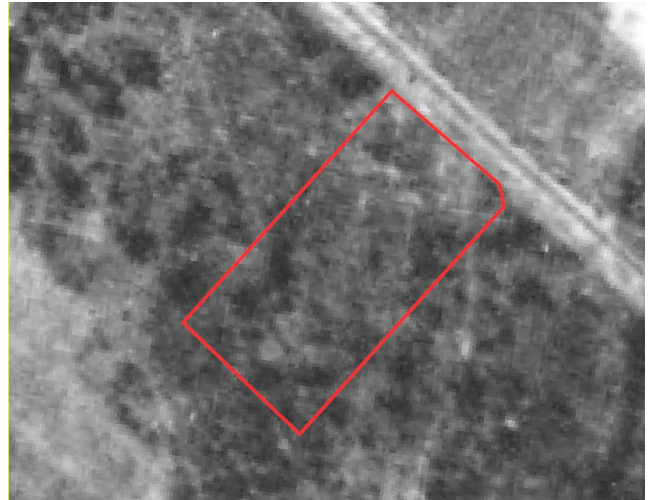


Figure 3 – 1930 aerial photograph of the subject area (red outline)

Source: NSW Government, Historical Imagery Viewer



Figure 4 – 1943 aerial photograph of the subject area (red outline)

Source: NSW Government, Historical Imagery Viewer



Figure 5 – 1951 aerial photograph of the subject area (red outline)

Source: NSW Government, Historical Imagery Viewer



Figure 6 - 1965 aerial photograph of the subject area (red outline)

Source: NSW Government, Historical Imagery Viewer



Figure 7 - 1971 aerial photograph of the subject area (red outline)

Source: NSW Government, Historical Imagery Viewer



Figure 8 - 1978 aerial photograph of the subject area (red outline)

Source: NSW Government, Historical Imagery Viewer



Figure 9 - 2025 aerial photograph of the subject area (red outline)

Source: NSW Government, Historical Imagery Viewer

3 Archaeological Resources

Any physical evidence of past human activity can be considered an archaeological resource, even very recent structures and objects.⁵ However, not all archaeological resources require preparation of an archaeological assessment if they are to be impacted.

Relevant archaeological resources are those which are protected under Commonwealth and/or State legislation. These are limited to:

- Historical archaeological items listed on the World Heritage List ('WHL'), the National Heritage List ('NHL') and the Commonwealth Heritage List ('CHL'), which are protected under sections 15A, 15C, 27A and 27C of the EPBC Act *Environment Protection and Biodiversity Conservation Act 1999* (Cth) ('EPBC Act')
- Historical archaeological items listed on the State Heritage Register ('SHR') or subject to an Interim Heritage Order ('IHO'), which are protected under Part 4 of the *Heritage Act 1977* (NSW) ('Heritage Act')
- Unlisted historical 'relics' protected under Part 6, Division 9 of the Heritage Act.

No previous archaeological assessment has been identified that addresses the possibility of the subject area retaining any of the above resources. A preliminary assessment is therefore provided below.

3.1 Listed Archaeological Items

Properties and places listed on the WHL, NHL or CHL, are included in the Australian Heritage Database ('AHD'). The AHD also includes places under consideration, or that may have been considered, for any one of these lists. A search of the AHD was undertaken on 3 October 2025. The search did not identify any archaeological items within the curtilage of the subject area that are protected under the EPBC Act.

Historical archaeological items that are listed on the SHR or that are subject to an IHO are included in the State Heritage Inventory ('SHI'). A search of the SHI was undertaken on 3 October 2025. The search did not identify any heritage items within the curtilage of the subject area.

3.2 Historical Relics

A historical 'relic' is defined in section 4(1) of the Heritage Act as:

...any deposit, object or material evidence

(a) which relates to the settlement of the area that comprises New South Wales, not being an Aboriginal settlement, and;

(b) is of State or local heritage significance.

Guidance on the meaning of part (a) of the above definition is found in *Waterways Authority v Coal and Allied* [2005] NSWSC 1285 ('Waterways') and *Cousins v Transport for NSW* [2020] NSWLEC 146 ('Cousins'). In *Waterways*, the Supreme Court found that an early 20th century wharf at Balls Head on the north shore of Sydney Harbour did not meet this threshold requirement because the whole of Sydney Harbour had been

⁵ Heritage Office and Department of Urban Affairs and Planning 1996, *Archaeological Assessment Guidelines*

settled for a 'considerable period' by that time. The Court in Cousins was more explicit, stating that material dating to '40 to 60 years after the commencement of European colonial settlement' of a region could not reasonably be regarded as satisfying part (a) of the definition of a 'relic'.

Heritage significance, as recited in part (b) of the definition of a 'relic', is assessed against the criteria described in *Assessing Heritage Significance, Guidelines for Assessing Places and Objects Against the Heritage Council of NSW Criteria* (DPE 2023). Of primary relevance to archaeological material is 'Criterion (e): Research Potential', which ascribes significance to sites that can provide information that is not already known or readily available from other sources.

The earliest historical development within the subject area appears to have occurred in the 1940s or early 1950s, when the land was cleared of vegetation and utilised for agriculture. As the area around the subject area was developed as early as 1802, any material remains within the subject area are unlikely to satisfy part (a) of the definition of 'relic' as they do not relate to the settlement of the area. Furthermore, such material is unlikely to provide information that is not already known or readily available from other sources. It is therefore unlikely to be considered 'significant' and would therefore not satisfy part (b) of the definition of 'relic'.

There is therefore no reasonable cause to suspect that subject area retains any 'relics' that would be protected under Section 57(1) of the Heritage Act.

4 Impact Assessment

The proposed development of the subject area comprises the redevelopment of the site for a mixed-use development comprising residential accommodation and retail uses. The proposed development will include the following works:

- Demolition of all existing four-storey residential flat buildings on the site
- Construction of two mixed-use buildings comprising a 60 and 52 storey building respectively, which will accommodate:
 - 858 Residential apartments inclusion 10% affordable housing of the uplift being sought
- Six (6) levels of basement with 825 car parking spaces, bicycle parking, services.
 - A two-level commercial podium containing:
 - Retail spaces
 - Four townhouses
 - Residential lobbies
 - Waste Storages
 - Residential and visitor Parking spaces
 - Bicycle Parking spaces
- Communal Open Space and residential amenities on level four (4).
- Rooftop Terrace on Level 52 of Cottonwood Crescent Tower and level 60 of Waterloo Road Tower.

The proposal includes provision to amend Clauses 4.3 and 4.4 of the *Ryde Local Environmental Plan 2014 (RLEP2014)* by virtue of the concurrent rezoning process. This includes the following amendments:

- Clause 4.3 – Height of Buildings:
 - Amend the current 65m maximum building height to 205.5m
- Clause 4.4 – FSR:
 - Amend the current FSR of 4.5:1 to 17:8:1

As discussed in the preceding Section, no listed archaeological items or places have been identified within the subject area and it is unlikely that the subject area retains any archaeological resources that would meet the thresholds requirements of the definition of a 'relic' under the Heritage Act. Therefore, the works proposed under SSD-94006708 are unlikely to impact any relevant archaeological resources.

5 Mitigation Measures

In view of the foregoing, it is recommended the following procedures be implemented to mitigate impacts to archaeological resources in the unlikely event that any such resources are encountered during the works proposed under SSD-94006708.

5.1 Unexpected Archaeological Finds Procedure

In the unlikely event that any potential archaeological resources are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find must immediately stop. The find location and minimum 2m buffer should be cordoned off with signage identifying the area as a 'no-go zone' to prevent accidental impact. The find must not be moved 'out of the way' without assessment.
2. The site supervisor or another nominated site representative must contact either the project archaeologist (if relevant) or Heritage NSW (Enviroline 131 555) to contact a suitably qualified archaeologist.
3. The nominated archaeologist must examine the find, provide a preliminary assessment of significance, record the item and decide on appropriate management measures. Heritage NSW should be notified of the find through a Section 146 notification. Such management may require further consultation with the approval authority, preparation of a research design and archaeological investigation/salvage methodology.
4. Depending on the significance of the find, reassessment of the archaeological potential of the subject site may be required and further archaeological investigation undertaken.
5. Reporting may need to be prepared regarding the find and approved management strategies.
6. Works in the vicinity of the find can only recommence upon receipt of approval from Heritage NSW.

5.2 Human Remains Procedure

In the unlikely event that human remains are uncovered during any site works, the following must be undertaken:

1. All works within the vicinity of the find must immediately stop and the location cordoned off with signage installed to stop any accidental impact to the finds.
2. The site supervisor or other nominated manager must notify the NSW Police and Heritage NSW (Enviroline 131 555).
3. The find must be assessed by the NSW Police, which may include the assistance of a qualified forensic anthropologist.
4. Management recommendations are to be formulated by the NSW Police and Heritage NSW.
5. Works are not to recommence until the find has been appropriately managed.

6 Summary

The above findings are summarised as follows:

- No listed archaeological items have been identified within the subject that are protected under the EPBC Act or Heritage Act.
- It is unlikely that the subject area retains any archaeological resources that would meet the threshold requirements of the definition of a 'relic' under the Heritage Act due to the late development of the subject area, dating only to the 1940s or 1950s.
- Consequently, the works proposed under SSD-94006708 are unlikely to impact any relevant historical archaeological resources.
- A Historical Archaeological Assessment is therefore considered unnecessary for SSD-94006708, subject to the unexpected finds and human remains procedures outlined above being implemented during the proposed works.

Yours faithfully,

A handwritten signature in black ink, appearing to be "A. Olsen", with a long horizontal flourish extending to the right.

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