



Our ref: DOC19/1033987

Senders ref: SSD 8903 (City of Ryde)

Andy Nixey
Principal Planning Officer
Key Sites Assessments
Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2001

Dear Mr Nixey,

Subject: EES comments on Response to Submissions – Ivanhoe Estate redevelopment – Stage 1 (SSD 8903) (City of Ryde)

Thank you for your email of 20 November 2019 requesting advice from the Energy, Environment and Science Group (EES) on Response to Submissions (RtS) for Ivanhoe Estate redevelopment – Stage 1 (SSD 8903) (City of Ryde).

EES has reviewed the relevant documents and make the following comments.

Biodiversity

It is noted that the table titled Response to Agency Submissions and the Amended Proposal Ivanhoe Estate - Stage 1 SSD 8903 prepared by Ethos Urban, dated July 2019 includes the incorrect date for the Biodiversity Assessment Report and Offset Strategy (BAR&OS) prepared by Eco Logical Australia i.e. September 2018, instead of October 2019. Therefore, EES requires the BAR&OS dated October 2019 be referred to for offset requirements and mitigation measures for the Ivanhoe Estate Re-development SSD 8903.

The table referred to above states “Biodiversity Management Plan and Construction Environment Management Plan ... are to have reference to the recommendations of the Biodiversity Assessment Report and Offset Strategy prepared by Eco Logical Australia dated September 2018 where relevant.” However, EES recommends that all the mitigation measures listed in Tables 15, 16 and 17 of the BAR&OS prepared by Eco Logical Australia (October 2019) are included in the Biodiversity Management Plan (BMP) and/or the Construction Environment Management Plan (CEMP), and EES also recommends all these measures are implemented.

Further, within the same table under the heading ‘Flora and Fauna’ it is stated that “Acquire and retire biodiversity offsets in accordance with the Biodiversity Assessment prepared by Eco Logical Australia dated September 2019” and “Provide nest boxes to replace hollow bearing trees”.

However, EES requires that:

- the offsetting requirements calculated as part of the Ivanhoe Estate Re-development SSD17_8707 - Biodiversity Assessment Report and Offset Strategy prepared by Eco Logical Australia October 2019 to be followed and
- all removed hollows are replaced with artificial nest boxes at a ratio of 1:4 (removed: replaced), with installation occurring within the retained vegetation along Shrimptons Creek.

OEH's previous comments referred to a BMP, a weed management plan, a CEMP and a vegetation management plan (VMP). EES notes the BMP will include measures for pre-clearance surveys and clearance supervision, replanting and vegetation management, and weeding and ongoing measures as noted on page 38 of the BAR&OS (Eco Logical Australia dated October 2019).

EES also notes that a weed management plan will be included within the BMP as outlined on page 40 of the BAR&OS (Eco Logical Australia dated October 2019). However, no mention is made of a VMP and other issues, like local provenance, are also not referred to.

As such, EES recommends the following to be addressed and inform part of a stand-alone VMP, or can be incorporated into the BMP:

- the long-term management of all vegetation retained on site
- the rehabilitation and management of vegetation along Shrimptons Creek
- the use of local provenance species appropriate for the threatened ecological communities and plant community types present on the site and
- the monitoring of vegetation to ensure its long-term viability.

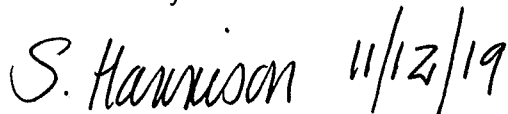
EES reiterates previous advice that should the Planning and Assessment Group determine to grant approval for Stage 1, EES recommends that the BMP, weed management plan, CEMP and VMP as well as other recommendations contained in this letter are included as conditions of consent.

Flooding

There are no outstanding flooding issues.

If you have any queries regarding this matter, please do not hesitate to contact Bronwyn Smith Senior Conservation Planning Officer on 02 8973 8604 or at Bronwyn.smith@environment.nsw.gov.au

Yours sincerely



Susan Harrison

**Senior Team Leader Planning
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Environment, Energy and Science**