



Office of Environment & Heritage

Your reference: SSD 5093
Our reference: DOC14/156230
Contact: Rachel Hannan
02 8837 6088

Mark Brown
Senior Planner
Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Mr Brown

I refer to your correspondence to the Office of Environment and Heritage dated 6 August 2014 advising of the public exhibition of the SSD application for the M2 site, North Ryde Station Urban Activation Precinct.

OEH has reviewed the Environmental Impact Statement (EIS) and provides the following comments.

Bushland Reserve

The proposal should clarify the nature of the proposed bushland reserve. The objectives of the Bushland Reserve articulated in the EIS and accompanying reports are to provide a natural bushland reserve. OEH considers that the RE1 Public Recreation zoning is not appropriate for the long term management of this land as a bushland reserve. A more appropriate zone for achieving the stated objectives of this reserve is E2 Environmental Conservation.

The Stormwater Management Plan (Appendix H) proposes modifications to the culvert under Spine Road to accommodate stormwater flows to Porters Creek, in the proposed bushland reserve. It is unclear whether this section of Porters Creek is also to form a stormwater detention function. The physical structures for stormwater drainage, particularly the extent of area of scour protection, are inconsistent with the designs and proposals in the Urban Design and Landscape Plans (Appendix E), Ecological Impact Assessment (Appendix J) and Vegetation Management Plan (Appendix K).

The impacts of the proposed stormwater drainage management within the bushland reserve (physical construction and potential impacts to creek stability and the vegetation community) have not been identified or assessed.

The reports accompanying the EIS (including Appendix E, J, K and H) do not accurately or consistently reflect the proposed scope of works, or assess the impacts of the development including infrastructure works.

Stormwater Management

OEH has concerns about the potential cumulative impacts to the downstream waterways and ecosystems as the development of the Macquarie Park Corridor progresses. All waterways within the Macquarie Park Corridor, including Porters Creek, eventually flow to the Lane Cove River through the Lane Cove National Park. These waterways are subject to frequent flooding and are affected by increased nutrient loads and weed invasion. OEH notes that the EIS (s7.9) and the Stormwater Management Plan (Appendix H) state that Water Sensitive Urban Design elements, including source control, will be implemented.

OEH requests that the Stormwater Management Plan specifically assess and address pre and post development peak flow rates and any impacts to the geomorphic stability of affected waterways. To avoid adverse impacts to downstream waterways, the stormwater management for the M2 site must ensure that the water runoff regime is as close as possible to pre-development flows, or alternatively demonstrate a neutral or beneficial effect on environmental values, including for downstream environments.

Biodiversity

The EIS and Ecological Impact Assessment (Appendix J) do not assess the vegetation or any impacts on the southern side of Delhi Road.

The area of Sydney Turpentine Ironbark Forest (STIF) endangered ecological community (EEC) on Bundarra Reserve is contiguous with the vegetation on the adjoining RMS land and a desktop review shows that the STIF EEC also occurs on the RMS land. The proposal indicates that the pedestrian overbridge will require construction activities on this RMS land. The EIS should include an assessment of all native vegetation and ecological communities to be affected by the proposal, an assessment of these impacts, and a description of the actions that will be taken to avoid or minimise impacts or compensate for unavoidable impacts of the project on any threatened species, population or ecological communities.

The proposal indirectly impacts on Bundarra Reserve by overshadowing. The impacts from overshadowing have not been considered in the Ecological Impact Assessment (Appendix J).

If you have any queries regarding this matter please contact Rachel Hannan, Conservation Planning Officer, on 8837 6088.

Yours sincerely

A handwritten signature in black ink that reads "S. Harrison" followed by the date "11/09/14".

SUSAN HARRISON
Senior Team Leader Planning, Greater Sydney
Regional Operations Group