



Office of  
Environment  
& Heritage

DOC18/169807  
SSD 5093 MOD 4

Mrs Annie Leung  
Team Leader  
Key Sites Assessments  
NSW Planning and Environment  
GPO Box 39  
SYDNEY NSW 2001

Attention: Genevieve Hastwell

**Exhibition of Modification for the M2 site, North Ryde Station Urban Activation precinct  
(Lachlan's Line) - SSD 5093 MOD 4**

Dear Mrs Hastwell,

Reference is made to your letter dated 19 March 2018, to the Office of Environment and Heritage (OEH) regarding the modification application for the M2 site and North Ryde Station Urban Activation precinct involving the construction of a pedestrian bridge and removal of an additional 17 trees.

Please find attached OEH comments in Attachment 1.

Should you have any queries regarding this matter, please contact Svetlana Kotevska, Senior Conservation Planning Officer on 8837 6040 or at [Svetlana.kotevska@environment.nsw.gov.au](mailto:Svetlana.kotevska@environment.nsw.gov.au).

Yours sincerely

*S. Harrison* 06/04/18

**SUSAN HARRISON**  
**Senior Team Leader Planning**  
**Greater Sydney**  
**Regional Operations**



**Attachment 1 – Office of Environment and Heritage (OEH) comments M2 and North Ryde Urban Activation Precinct SSD 5093 Mod 4**

- A Biodiversity Development Assessment Report (BDAR) is to be prepared in accordance with the Biodiversity Conservation Act 2016 (Clause 7.17) and Biodiversity Conservation Regulation 2017 (Part 7, Clause 30). Please note OEH considers that there is no ability to waive the need for a BDAR to be prepared in this instance, as the modification proposal will result in an increased impact on biodiversity values (increase in vegetation clearing from 200m<sup>2</sup> to 450m<sup>2</sup> of Sydney Turpentine Ironbark Forest (STIF)). The BDAR must apply the biodiversity assessment method (BAM).
- It is recommended the proponent reassesses whether there is potential to amend the proposed modification to reduce the proposed 5m buffer around the pedestrian bridge footprint to retain STIF and avoid clearing some of the STIF within the area. This would be consistent with the principles of avoid and minimising impacts as per the objects of the BC Act, 2016 which have not been addressed in the current modification. It is noted that 13 trees are proposed to be removed because they are within the 5m offset (buffer area) from the pedestrian bridge, as identified in Section 7 Tree Survey Table of the Arborists report dated October 2017. The reasons given for this buffer are not considered justifiable or reasonable ("minimize tree falls, heat of bushfire on steel and bird droppings and Eucalyptus Oil and leaf litter corroding the paint"). These 13 trees could be retained and eight of these trees are in average to good condition.
- A further, 10 trees are proposed to be removed that are within an area defined as a fall zone should they fall in some unforeseen circumstance and impact on the bridge. These trees are identified due to their heights or potential mature heights. Of these 10 trees, 7 are in average health and only 1 is in poor health and further only two trees are 28m high, with the majority below 10m in height.
- No details are given in the SEE regarding pier 4. The Ecological report refers to "impacts to the threatened ecological community (TEC) on the eastern side of the motorway (pier 4)".
- It is recommended that the Vegetation Management Plan be conditioned as part of any future consent issued.

(END OF SUBMISSION)