

6 July 2018

Our Ref: Response to RFI

Department of Planning and Environment
GPO Box 39
SYDNEY NSW 2000

Attention: Genevieve Hastwell

By email: genevieve.hastwell@planning.nsw.gov.au

Dear Genevieve,

RE: Modification to M2 site, North Ryde Station Urban Activation Precinct (SSD 5093 MOD4) (Lachlan's Line)- Request for Response to Submissions

The Department of Planning and Environment (DPE) is currently assessing a modification application to Lachlan's Line at North Ryde under SSD 5093 MOD4).

DPE issued a 'Request for Response to Submissions' letter to Landcom on 6 April 2018. This letter required further consideration of impacts related to Bundarra Reserve and noise impacts related to night time construction. This letter responds to each of the issues raised for DPE's consideration.

1. Additional Tree removal / Impacts to Bundarra Reserve

In response to the issues raised by City of Ryde Council, OEH and the community, Landcom engaged Biosis to prepare a Biodiversity Development Assessment Report (BDAR) (Attachment 1). The BDAR identifies how the impacts to Bundarra Reserve will be minimised and identifies offset obligations to offset the likely biodiversity impacts as a result of the development.

RMS has also agreed to reduce the maintenance buffer zone it requires around the structure from 5m to 3m.

Concurrently, Landcom has consulted with the City of Ryde on the construction approach that will be undertaken for building the piers and piles. With regard to the location of Pier 2, following investigations and consideration of various alternative construction methodologies against a broad set of criteria, Landcom has reached agreement with Council on a preferred option. The agreed approach will see Council grant temporary access to a 21m² area of Bundarra Reserve in the most north-eastern corner. This area will facilitate construction of a level, elevated earth retained platform to provide the necessary piling rig access. This proposal has the least permanent impact to the root zones of adjacent trees in Bundarra Reserve. Minor impacts to Bundarra Reserve have now been reduced to:

- the removal of three small, low significance trees (T36, T37 (dead) and T39) that are not characteristic of Sydney Turpentine-ironbark Forest, and which are also affected by the required RMS 3m maintenance buffer zone

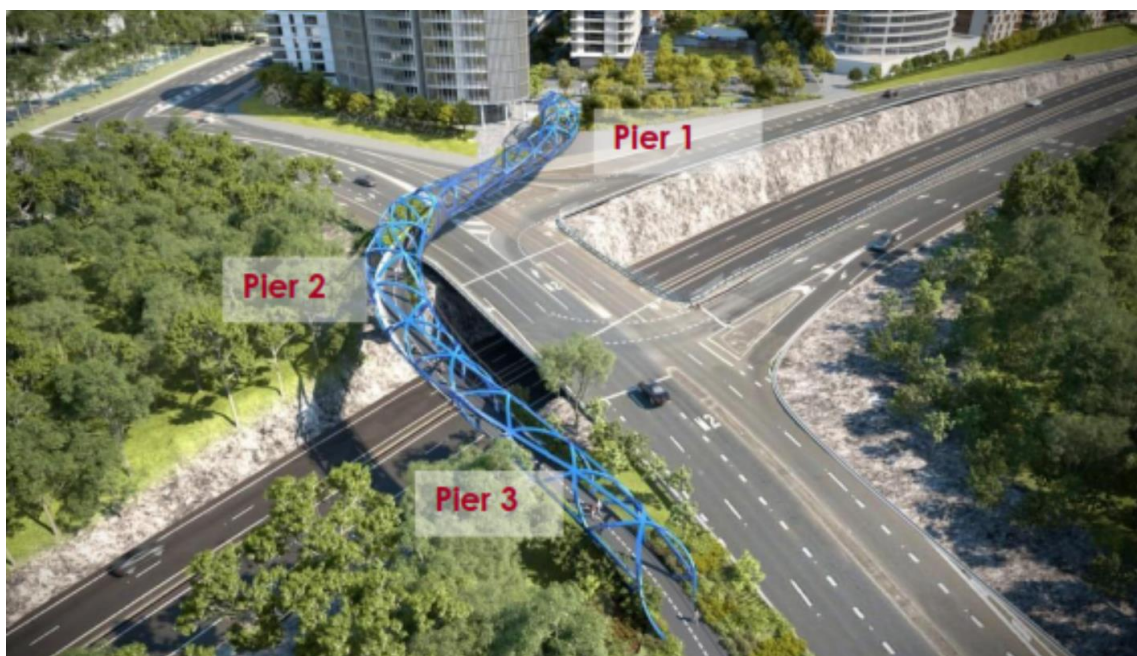


- on-ground compaction impacts of up to 21m² of soil containing Sydney Turpentine-Ironbark Forest seed-bank, and
- up to 25-30m² of canopy overhang impacts from the removal of tree T29 (Blackbutt *Eucalyptus pilularis*) being a tree located within the adjacent RMS road corridor (outside of Bundara Reserve).

The comparison between the impacts from the original scope of works at lodgement to the current proposal is outlined within Table 1. This shows that an additional eight trees will be retained as a result of changes to the construction methodology.

Table 1 Comparison of tree impacts

Location of tree impact	February MOD proposal (seek removal)	May MOD revised proposal (seek removal)	Description
Pier 1 (Lachlan's Line)	12	10	Savings achieved through reduced buffer zone
Pier 2 (Bundara Reserve)	8	3	Retains all medium and high significance trees
Pier 3 (near station)	10	9	Retains a high significance tree thanks to savings achieved through reduced buffer zone
TOTAL	30	22	We have also reduced RMS maintenance zone for 5m to 3m



Source: Arboricultural Impact Assessment, prepared by Arboreport

Figure 1 Location of piers



The amended plans and detail were provided to Council for its independent review. Council advised that based on the amended detail, the proposed modification and resulting impacts to Bundara Reserve are supported. A copy of the correspondence provided from Council is attached at Attachment 2. The reduced impact is also considered to respond to and satisfy the comments raised by the Office of Environment and Heritage.

In summary, while Bundara Reserve is impacted due to the limitations of difficult construction access, the impacts are overall considered minor and have been minimised through the refinement of the construction methodology. Following a review of the combined vegetation removal, Biosis has identified that biodiversity offsets are required for residual impacts to native vegetation as a result of the proposed modification, which equate to the need to purchase and retire two credits of *Turpentine - Grey Ironbark open forest on shale in the lower Blue Mountains, Sydney Basin Bioregion*.

A copy of the updated Arboricultural Impact Assessment Report has also been provided at **Attachment 3**.

2. Night time construction

The only high noise generating activity that will require undertaking at night relates to six nights of tree felling next to the motorway:

- Three nights at Pier 2 (Bundara Reserve)
- Three nights at Pier 3 (closest to North Ryde Station).

This is the case for only those trees that are immediately adjacent to the motorway and are at risk of falling into the M2 carriageway below. The balance / handful of residual trees will be removed by day. Trees will not be chipped on site at night, rather they will be loaded into a truck and chipped in the main Lachlan's Line compound by day during standard construction hours to limit impacts.

The requirement to fell trees at night is governed by safety and the requirement by TfNSW Transport Management Centre and The Hills M2 Motorway who only allow M2 lane closures at night.

The balance of the project that requires infrequent night works (due to lane occupation by primarily service / delivery vehicles) are unavoidable, however are assessed as being only of low to medium noise generating. The mitigation measures adopted, and relative low frequency are not assumed to cause neighbours an audible impact. Noise will be mitigated as far as practical to limit impacts to surrounding residents.

As requested by DPE, Landcom has provided a detailed schedule of works relating to the pedestrian bridge which identifies the night time construction activities. The schedule also outlines the timeframe required for the associated night time construction activities with mitigation measures to minimise noise impacts to any nearby residents. A copy of the works schedule is attached at **Attachment 4**. As per Condition C1, night time works are permitted where required by other authorities and will only be carried out where no other alternative options are available and will be sporadic in nature to minimise extended exposure to surrounding residents.

The Acoustic Report is provided at **Attachment 5**. In addition a location plan showing the nearest residential receivers to the temporary construction shed has been provided at **Attachment 8**.



3. Additional Information

- a. A detailed survey plan showing the location of the pedestrian bridge, pier, property boundaries and site levels has been provided as part of the Arboricultural Impact Assessment Report at Attachment 3.
- b. The plan provided at Attachment 3 identifies the surveyed location of trees and highlights the trees proposed to be removed.
- c. Stormwater

Landcom engaged Arenco Daracon Group to prepare a Stormwater Plan (plan no.ADJV-SK-030, Rev B). This plan is attached at Appendix 6. It provides for 3 x 20,000 litre on-site storage tanks to ensure stormwater run-off from the temporary shed does not exceed the maximum 5 year ARI discharge rate, as required by Council. The tanks ultimately connect into the existing stormwater system to manage flows from the temporary structure.

4. Public Submission

A review of the public, Government and Agency submissions received by Department of Planning and Environment during the public exhibition period has been undertaken. A response to the various submissions received has been provided at Attachment 7. None of the submissions received are considered to warrant refusal of the application.

If you have any questions about the information provided, please contact me on 9249-4100 or Greg Betts (Landcom) on 9841 8600.

Yours faithfully

GLN PLANNING PTY LTD

PIP HYDE
ASSOCIATE DIRECTOR

Attachment 1 Biodiversity Development Assessment Report by Biosis

Attachment 2 Correspondence from City of Ryde Council

Attachment 3 Arboricultural Impact Assessment Report prepared by Arboreport

Attachment 4 Works Schedule

Attachment 5 Acoustic Report

Attachment 6 Stormwater Plan



Attachment 7 Response to submissions

Attachment 8 Location of nearest residential receiver to temporary shed