

Section 4.55(1A) Application for Modification (SSD 6339)

St Catherine's School, 26 Albion Street, Waverley



Section 4.55(1A) Application for Modification

Statement of Environmental Effects to
Minister for Planning and Public Spaces

Prepared on behalf of St Catherine's School

14 June 2019 | 1330

Contents

1.0 Introduction	1
2.0 Site location and description	2
3.0 The Consent (SSD 6339)	5
4.0 Proposed modifications to the approved plans	7
5.0 Proposed modifications to conditions of consent	10
5.1 SCHEDULE 1	10
5.2 SCHEDULE 2: CONDITIONS OF CONSENT FOR CONCEPT PROPOSAL	11
5.3 SCHEDULE 3: CONDITIONS OF CONSENT FOR STAGE 1 WORKS	12
6.0 Section 4.55(1A) Considerations	14
7.0 Planning assessment	15
7.1 S.4.15(1)(a) State, regional and local plans	15
7.2 S.4.15(1)(b) Impact on the environment	15
7.3 S.4.15(1)(c) Suitability of the site	16
7.4 S.4.15(1)(d) Any submissions made in accordance with the Act or Regulations and S.4.15(1)(e) The public interest	16
8.0 Conclusion	17

Figures

1 Site location	4
2 Aerial photograph	4
3 Original consent: Master Plan Staging (Source: A.000_A)	8
4 Section 4.55(1A) Proposal: Master Plan Staging (Source: A.000_E)	9

Appendices

A Section 4.55 Campus Plans, by Mayoh Architects
B Section 4.55 Stage 1 RPAC Plans, by Mayoh Architects
C Section 4.55 Landscape Plans, by Taylor Brammer
D Access Report, by Access Australia
E BCA Report, by AED Group

1.0 Introduction

This Section 4.55(1A) Statement of Environmental Effects (**SEE**) is submitted to the NSW Department of Planning and Environment (the **Department**). It describes a Section 4.55(1A) application that proposes modifications to the development consent for SSD 6339 (issued on 6 April 2016) which approved the following development at St Catherine's School, 26 Albion Street, Waverley (the **site**):

- Conceptual Proposal for a Campus Master Plan that comprises demolition works, new buildings, alterations and additions, access arrangements, circulation and landscaping
- Stage 1 works including construction of the new Research, Performing Arts and Aquatic Centre (**RPAC**).

This SEE has been prepared by Robinson Urban Planning Pty Ltd (**RUP**) on behalf of St Catherine's School (the land owner and applicant).

The Section 4.55(1A) described in this SEE proposes:

1. Separation of the Stage 1 RPAC works into the following two phases of construction:
 - (a) Stage 1 works - Phase A: Performing Arts and Aquatic Centre (including all of the approved Stage 1 demolition works), demolition of existing pool, tree removal, associated landscaping work, relocation of demountable building, minor internal alterations to existing Dame Joan Sutherland Centre (**DJSC**), minor removal of landscaping at Gate 1 and reconfiguration of car existing parking
 - (b) Stage 1 work - Phase B: Research Centre and associated landscaping work.
2. Minor modifications to the design of Stage 1 RPAC works including:
 - (a) Landscape changes including rationalisation of retaining walls and fencing, amendment to landscaping work around existing magnolia tree and amendments to Discovery Court design
 - (b) Minor internal replanning of toilets, change rooms, store rooms and office, kitchenette and laundry, stairs, weights and fitness room, service risers, theatre manager's office etc
 - (c) Minor external modifications including:
 - (i) Connection and link with Jo Karaolis Sports Centre removed and reduce extent of works within the sports centre
 - (ii) External stair to Research Centre relocated
 - (iii) Temporary roof structure provided for wet weather link between RPAC (Phase A) and Jo Karaolis Sports Centre. To be demolished at commencement of Phase B
 - (iv) External material selection changes
 - (v) New bin enclosure for 4 Macpherson Street.

This SEE identifies the consent and describes and assesses the Section 4.55(1A) proposal.

The SEE is accompanied by the following modified plans and information:

- **Appendix A** Section 4.55 Campus Plans, by Mayoh Architects
- **Appendix B** Section 4.55 Stage 1 RPAC Plans, by Mayoh Architects
- **Appendix C** Section 4.55 Landscape Plans, by Taylor Brammer
- **Appendix D** Access Report, by Access Australia
- **Appendix E** BCA Report, by AED Group.

2.0 Site location and description

The key characteristics of the site are summarised below:

Location	St Catherine's School, at 26 Albion Street, Waverley is located on the north-eastern corner of Albion Street and Macpherson Streets. The school also has frontages to Leichhardt Street and Leichhardt Lane (Figures 1 and 2).																				
Legal description	<table><thead><tr><th><u>Lot</u></th><th><u>DP</u></th></tr></thead><tbody><tr><td>A</td><td>318719</td></tr><tr><td>B</td><td>318719</td></tr><tr><td>C</td><td>318719</td></tr><tr><td>1</td><td>80046</td></tr><tr><td>12</td><td>2049</td></tr><tr><td>13</td><td>2049</td></tr><tr><td>16</td><td>2049</td></tr><tr><td>117</td><td>1161589</td></tr><tr><td>560</td><td>1138118</td></tr></tbody></table>	<u>Lot</u>	<u>DP</u>	A	318719	B	318719	C	318719	1	80046	12	2049	13	2049	16	2049	117	1161589	560	1138118
<u>Lot</u>	<u>DP</u>																				
A	318719																				
B	318719																				
C	318719																				
1	80046																				
12	2049																				
13	2049																				
16	2049																				
117	1161589																				
560	1138118																				
Site area	22,290m ²																				
Zoning	Most of the site is in Zone SP2 Infrastructure (Educational Establishment), pursuant to Waverley Local Environmental Plan 2012 (Waverley LEP 2012). A small portion of the Junior School is in Zone R3 – Medium Density Residential and the Headmistress' residence is in Zone R2 – Low Density Residential.																				
Heritage	<p>The site accommodates the following local heritage items pursuant to Waverley LEP 2012:</p> <ul style="list-style-type: none">• St Catherine's School and Grounds, Macpherson Street (Lot 1, DP 76210; Lot 1, DP 80046; Part Lot 560, DP 752011; Lot C, DP 318719) (I52)• Georgian style stone building, St John's, St Catherine's School, at 26 Albion Street (Lot 1, DP 76210; Lot 1, DP 80046; Part Lot 560, DP 752011; Lot C, DP 318719) (I444)• Late Victorian mansion, at 1 Leichhardt Street (Lot C, DP 318719) (I486)• Late Victorian Italianate Style house, at 5 Leichhardt Street (Lot 6, DP 2049) (I487)• Charing Cross Conservation Area (C7).																				
Topography	The site has a fall of around 10% from west to east and north to south.																				
Vegetation	The site accommodates several large mature trees, as illustrated on the aerial photograph. Additional street trees border the site along Macpherson Street and Albion Street.																				
Existing use	Existing buildings on the site comprise a mix of older buildings (some with heritage significance) and more contemporary buildings. The school accommodates a combination of paved and grassed outdoor																				

Surrounding
development

areas, indoor and outdoor sports facilities and the previously mentioned outdoor swimming pool. Building heights range from one to four storeys.

North

Adjoining the site to the north are two storey terrace houses along Albion Street and a combination of dwellings and apartments on Bronte Road. Further north is Charing Cross Village. Phillip House, a residential aged care facility, is at 319 Bronte Road and is bounded by the school on three sides.

South

A mix of two/three and four storey apartment buildings and dwelling houses are to the south of the site, beyond Macpherson Street.

East

To the immediate east of the site (and proposed Stage 1- RPAC) is a c.1960 residential flat building with four habitable levels above car parking at 4 Macpherson Street. Another apartment building at 7 Leichhardt Street is to the east beyond Leichhardt Lane. Further east is a mixture of attached and detached housing and apartments.

West

Apartment buildings with two to four storeys are to the south of the site, beyond Albion Street.



Figure 1 – Site location



Figure 2 – Aerial photograph

3.0 The Consent (SSD 6339)

Application No.:	SSD 6339
Approved	6 April 2016
Applicant:	St Catherine's School
Consent Authority:	Minister for Planning
Land	St Catherine's School, 26 Albion Street, Waverley (Lot 560 DP1138118, Lot 1 DP80046, Lots 12 and 13 DP2049, Lots A, B and C DP318719 and Lot 117 DP1161589)
Development (as modified)	<p><u>Concept Proposal</u> for the staged redevelopment of St Catherine's School over 15 years to support up to 1,200 students, comprising:</p> <ul style="list-style-type: none">• demolition works;• new buildings;• alterations and additions;• revised access arrangements;• revised circulation system;• additional car parking (19 spaces); and• landscaping works. <p><u>Stage 1 works</u>, including:</p> <ul style="list-style-type: none">• demolition of existing swimming pool;• construction of the Research, Performing Arts and Aquatic Centre building;• internal alterations to the Dame Joan Sutherland Centre;• construction of linkages to existing school buildings;• relocation of existing demountable building;• construction of additional car parking;• reconfiguration of existing car parking at Gate 1;• landscaping works, including tree removal;• reconfiguration of Macpherson Street drop-off/pick up arrangements; and• increase the maximum student population to 1,200 and staff numbers to 212 by 2030.
Approved Modification	<p>SSD 6339 MOD 1 approved 31 July 2018:</p> <ul style="list-style-type: none">• amendments to the internal layout and design of the Research, Performing Arts and Aquatic Centre building including an additional 89m² of gross floor area (GFA) and modified location and design of the rooftop plant services;

- amendments to the approved landscaping associated with the Research, Performing Arts and Aquatic Centre building; and
- amend the on-site car parking to include 1 additional car parking space.

4.0 Proposed modifications to the approved plans

The Section 4.55(1A) proposal described in this SEE proposes the following modifications to the approved development:

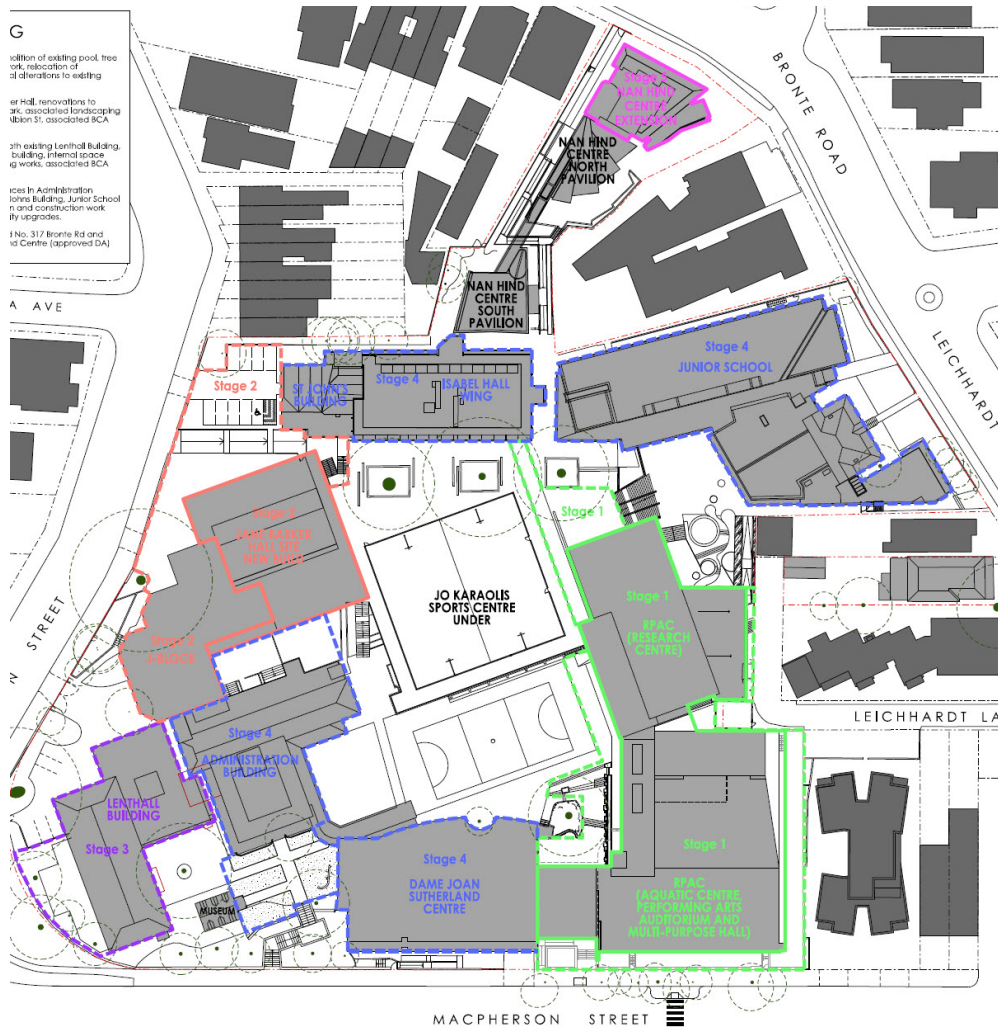
1. Separation of the Stage 1 RPAC works into the following two phases of construction:
 - (a) Stage 1 works - Phase A: Performing Arts and Aquatic Centre (including all of the approved Stage 1 demolition works), demolition of existing pool, tree removal, associated landscaping work, relocation of demountable building, minor internal alterations to existing DJSC, minor removal of landscaping at Gate 1 and reconfiguration of car existing parking
 - (b) Stage 1 work - Phase B: Research Centre and associated landscaping work.
2. Minor modifications to the design of Stage 1 RPAC works including:
 - (a) Landscape changes including rationalization of retaining walls and fencing, amendment to landscaping work around existing magnolia tree and amendments to Discovery Court design
 - (b) Minor internal replanning of toilets, change rooms, store rooms and office, kitchenette and laundry, stairs, weights and fitness room, service risers, theatre manager's office etc
 - (c) Minor external modifications including:
 - (i) Connection and link with Jo Karaolis Sports Centre removed and reduce extent of works within the sports centre
 - (ii) External stair to Research Centre relocated
 - (iii) Temporary roof structure provided for wet weather link between RPAC (Phase A) and Jo Karaolis Sports Centre. To be demolished at commencement of Phase B
 - (iv) External material selection changes
 - (v) New bin enclosure for 4 Macpherson Street.

The selection of the façade materials has been modified to:

- Ensure robust construction detailing, watertight construction, appropriate acoustic performance and compliance with the BCA including the requirement to adequately address current flammability issues
- Retain consistent with the design intent and colour pallet utilised for external finishes included in the Original Consent (specifically white, black, light grey, dark grey)
- Retain the role of the eastern façade of the auditorium as a backdrop to the new landscape along the eastern boundary, consistent with the Original Consent
- Change the façade material from prefinished compressed fibre-cement to a non-reflective (matte) colorbond steel cladding to reduce heat and light reflection, ensure water tightness, reduce construction durations and the associated impact on the amenity of the neighbouring properties.

The proposed modifications are illustrated on the attached plans and **Figures 3 and 4**):

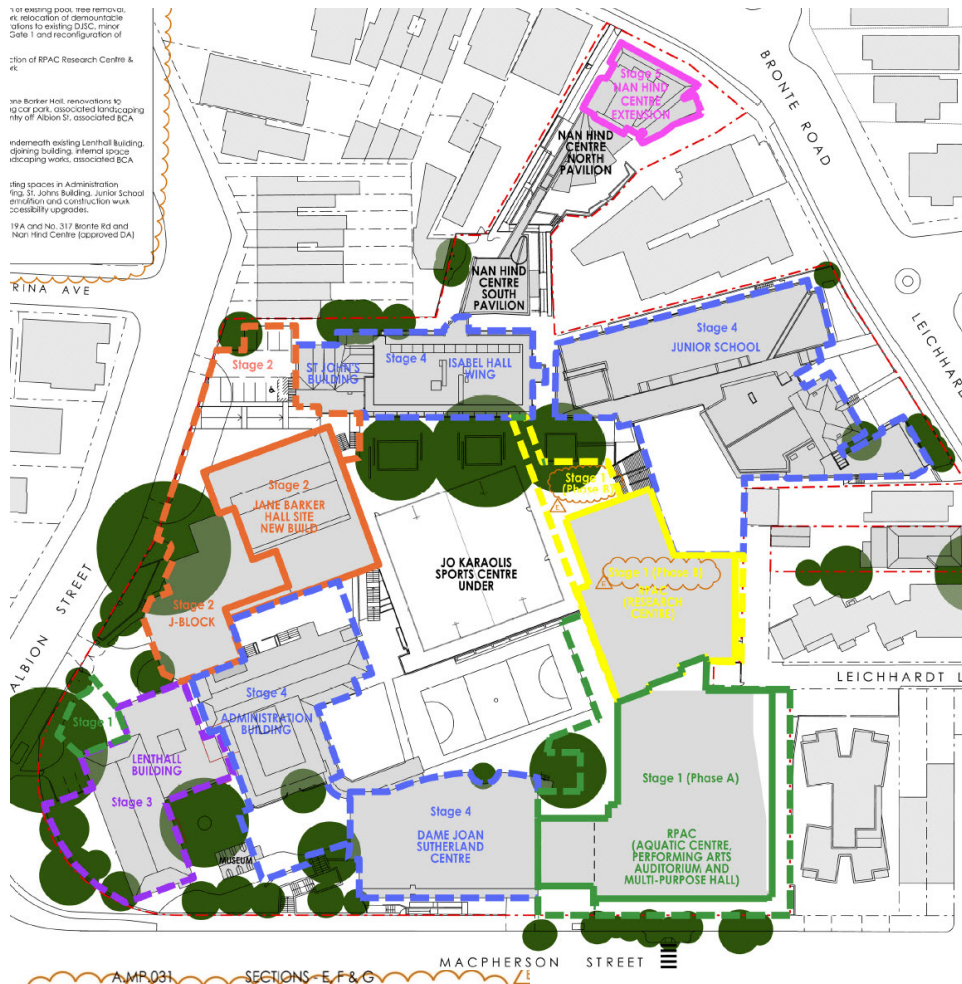
- Section 4.55 Campus Plans, which list and highlight the proposed modifications (**Appendix A**)
- Section 4.55 – Stage 1 RPAC Architectural Plans which list and highlight the proposed modifications (**Appendix B**)
- Section 4.55 –Landscape Plans (**Appendix C**).



MASTERPLAN STAGING

- Stage 1** Construction of RPAC, demolition of existing pool, tree removal, associated landscaping work, relocation of demountable building, minor internal alterations to existing DJSC.
- Stage 2** - Construction of Jane Barker Hall, renovations to J-Block, demolition of existing car park, associated landscaping including new pedestrian entry off Albion St, associated BCA and accessibility upgrades.
- Stage 3** New Infill building underneath existing Lenthall Building, minor demolition works to adjoining building, internal space reallocation, associated landscaping works, associated BCA and accessibility upgrades.
- Stage 4** Reallocation of existing spaces in Administration Building, DJSC, Isabel Hall Wing, St. Johns Building, Junior School Building including internal demolition and construction work and associated BCA and accessibility upgrades.
- Stage 5** Demolition of No. 319A and No. 317 Bronte Rd and construction of extension to Nan Hind Centre (approved DA)

Figure 3 – Original consent: Master Plan Staging (Source: A.000_A)



A.M.P.031 SECTIONS - E, F & G

MASTERPLAN STAGING

- Stage 1 - Phase A** - Construction of RPAC Aquatic Centre & Performing Arts, demolition of existing pool, tree removal, associated landscaping work, relocation of demountable building, minor internal alterations to existing DJSC, minor removal of landscaping at Gate 1 and re-configuration of existing car park.
- Stage 1 - Phase B** - Construction of RPAC Research Centre & associated landscaping work.
- Stage 2** - Construction of Jane Barker Hall, renovations to J-Block, demolition of existing car park, associated landscaping including new pedestrian entry off Albion St, associated BCA and accessibility upgrades.
- Stage 3** New Infill building underneath existing Lenthall Building, minor demolition works to adjoining building, internal space reallocation, associated landscaping works, associated BCA and accessibility upgrades.
- Stage 4** Reallocation of existing spaces in Administration Building, DJSC, Isabel Hall Wing, St. John's Building, Junior School Building including internal demolition and construction work and associated BCA and accessibility upgrades.
- Stage 5** Demolition of No. 319A and No. 317 Bronte Rd and construction of extension to Nan Hind Centre (approved DA)

Figure 4 – Section 4.55(1A) Proposal: Master Plan Staging (Source: A.000_E)

5.0 Proposed modifications to conditions of consent

The modifications listed above necessitate modifications to the following schedules/conditions in the consent for SSD 6339:

- **SCHEDULE 1**
 - Separation of the Stage 1 works into two phases
- **SCHEDULE 2: CONDITIONS OF CONSENT FOR CONCEPT PROPOSAL**
 - Condition A4: Development in Accordance with Plans and Documents
- **SCHEDULE 3: CONDITIONS OF CONSENT FOR STAGE 1 WORKS**
 - Condition A2: Development in Accordance with Plans and Documents

The requested modifications to each of the Schedules are noted below (new words shown in red and deleted words in ~~striketrough~~).

5.1 SCHEDULE 1

The following minor change is proposed to the description of the approved Stage 1 works shown at Schedule 1 of the consent for SSD 6339 to enable construction of the Stage 1 RPAC in two phases:

Development

....

Stage 1 works, including:

Phase A

- demolition of existing swimming pool;
- construction of the ~~Research~~, Performing Arts and Aquatic Centre building;
- internal alterations to the Dame Joan Sutherland Centre;
- construction of linkages to existing school buildings;
- relocation of existing demountable building;
- construction of additional car parking;
- reconfiguration of existing car parking at Gate 1;
- **interim works**
- landscaping works, including tree removal **including interim planting before completion of Phase B**;
- reconfiguration of Macpherson Street drop-off/pick up arrangements; and
- increase the maximum student population to 1,200 and staff numbers to 212 by 2030.

Phase B

- demolition of interim Phase A works
- construction of the **Research building**;
- landscaping works.

5.2 SCHEDULE 2: CONDITIONS OF CONSENT FOR CONCEPT PROPOSAL

5.2.1 Condition A4: Development In Accordance with Plans and Documents

Development In Accordance with Plans and Documents

A4. The applicant shall carry out the development generally in accordance with the:

- a) State Significant Development Application SSD 6339;
- b) Environmental Impact Statement except where amended by the Response to Submissions and the RtS Supplementary Responses;
- c) the conditions of this consent;
- d) Section 96 application dated 21 December 2017, all supporting documents, the Response to Submissions dated 6 April 2018 and supplementary Response to Submissions dated 7 May 2018; ~~and~~
- e) **Section 4.55 application dated 31 May 2019 and all supporting documents; and**
- ef) the following drawings, except for:
 - i) any modifications which are Exempt or Complying Development;
 - ii) as otherwise provided by the conditions of this consent.

Building Envelope Drawings prepared by PD Mayoh Pty Ltd			
Drawing No.	Issue	Name of Plan	Date
A.000	B E	COVER SHEET & STAGING DIAGRAM	24.09.14 27.05.2019
A.MP.007	D	CAMPUS SITE IMPACT ASSESSMENT 1: ENTRY POINTS AND PEDESTRIAN MOVEMENT & TRAFFIC MANAGEMENT AND PARKING	19.12.17
A.MP.008	B	CAMPUS SITE IMPACT ASSESSMENT 2: PRECINCTS & LANDSCAPE AREA AND BUILDING FOOTPRINT	28.11.17
A.MP.009	B	CAMPUS SITE IMPACT ASSESSMENT 3: GROSS FLOOR AREA CALCULATIONS & HEIGHT	28.11.17
A.MP.020	B	MASTER PLAN - LEVEL 1	19.12.17
A.MP.021	B	MASTER PLAN - LEVEL 2	19.12.17
A.MP.022	B	MASTER PLAN - LEVEL 3	19.12.17
A.MP.023	B	MASTER PLAN - LEVEL 4	19.12.17
A.MP.024	B E	MASTER PLAN - LEVEL 5	19.12.17 27.05.2019
A.MP.025	B E	MASTER PLAN - LEVEL 6	19.12.17 27.05.2019
A.MP.026	B E	MASTER PLAN - LEVEL 7	19.12.17 27.05.2019
A.MP.027	B	MASTER PLAN - LEVEL 8	19.12.17
A.MP.028	B	MASTER PLAN – ROOF PLAN	19.12.17

Building Envelope Drawings prepared by PD Mayoh Pty Ltd			
A.MP.030	A	SECTIONS - A, B, C & D	03.07.14
A.MP.031	A C	SECTIONS - E, F & G RPAC	19.12.17 27.05.2019
Concept Landscape Plan prepared by SILK Consulting Landscape Architects			
Drawing No.	Issue	Name of Plan	Date
MP-100	G	LANDSCAPE MASTER PLAN	19.08.14

5.3 SCHEDULE 3: CONDITIONS OF CONSENT FOR STAGE 1 WORKS

5.3.1 Condition A2: Development In Accordance with Plans and Documents

Development In Accordance with Plans and Documents

A2. The applicant shall carry out the development generally in accordance with the:

- a) State Significant Development Application SSD 6339;
- b) Environmental Impact Statement except where amended by the Response to Submissions and the RtS Supplementary Responses;
- c) the conditions of this consent;
- d) Section 96 application dated 21 December 2017, all supporting documents, the Response to Submissions dated 6 April 2018 and supplementary Response to Submissions dated 7 May 2018; ~~and~~
- e) Section 4.55 application dated 11 June 2019 and all supporting documents; and
- ef) the following drawings, except for:
 - i) any modifications which are Exempt or Complying Development;
 - ii) as otherwise provided by the conditions of this consent.

Architectural (or Design) Drawings prepared by PD Mayoh Pty Ltd			
Drawing No.	Revision	Name of Plan	Date
A.004	A	DEMOLITION PLAN	03.07.14
S96A.100 4.55(1A)100	B A	LEVEL 1 – S.96-PHASE A	19.12.17 27.05.2019
S96A.101 4.55(1A)101	B A	LEVEL 2 – S.96-PHASE A	19.12.17 27.05.2019
S96A.102 4.55(1A)102	B A	LEVEL 3 – S.96-PHASE A	19.12.17 27.05.2019
S96A.103 4.55(1A)103	B A	LEVEL 4 – S.96-PHASE A	19.12.17 27.05.2019
S96A.104 4.55(1A)104	B A	LEVEL 5 – S.96-PHASE A	19.12.17 27.05.2019
S96A.105 4.55(1A)105	B A	LEVEL 6 – S.96-PHASE A	19.12.17 27.05.2019
S96A.106 4.55(1A)106	B A	LEVEL 7 – S.96-PHASE A	19.12.17 27.05.2019

Architectural (or Design) Drawings prepared by PD Mayoh Pty Ltd			
S96A.107 4.55(1A)107	B A	ROOF PLAN – S-96 PHASE A	19.12.17 27.05.2019
4.55(1B)103	A	LEVEL 4 - PHASE B	27.05.2019
4.55(1B)104	A	LEVEL 5 - PHASE B	27.05.2019
4.55(1B)105	A	LEVEL 6 – PHASE B	27.05.2019
4.55(1B)106	A	LEVEL 7 – PHASE B	27.05.2019
4.55(1B)107	A	ROOF PLAN - PHASE B	27.05.2019
S96A.150 4.55A150	B A	ELEVATIONS SOUTH & EAST	19.12.17 27.05.2019
S96A.151 4.55A151	B A	ELEVATIONS NORTH & WEST	19.12.17 27.05.2019
S96A.160	B	SECTIONS A, B & C	19.12.17
S96A.161	B	SECTIONS D, E & F	19.12.17
Landscape Plan prepared by Taylor Brammer Landscape Architects Pty Ltd			
Drawing No.	Issue	Name of Plan	Date
LA01	€ E	SITE LANDSCAPE PLAN	12.12.2017 12.06.2019
LA02	€ E	TREE REMOVAL AND RETENTION PLAN	12.12.2017 12.06.2019
LA03	€ E	LANDSCAPE SECTIONS	12.12.2017 12.06.2019

6.0 Section 4.55(1A) Considerations

Section 4.55(1A) of the EP&A Act states that a consent authority may, on application being made by the applicant or any other person entitled to act on a consent granted by the consent authority, modify the consent if:

- a) *it is satisfied that the proposed modification is of minimal environmental impact, and*
- b) *it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which the consent was originally granted and before that consent as originally granted was modified (if at all), and*
- c) *it has notified the application, and*
- d) *it has considered any submissions made concerning the proposed modification*
Subsections (1), (2) and (5) do not apply to such a modification.

In accordance with these tests:

- The Section 4.55(1A) proposal will have minimal environmental impact as there is no change proposed to the approved development, except for the timing and delivery of the project in particular completion of Stage 1 in two phases
- The modified development would be substantially the same as “the development for which consent was originally granted and before that consent as originally granted was modified” as the Section 4.55(1A) proposal relates to project staging and detailed design issues only. The modified development would retain the main characteristics of the original consent including:
 - Scope of demolition works
 - Approved building bulk, height, scale, form
 - Access, car parking or transport arrangements
 - Increase in students and staff
 - Hours of operation or use of the RPAC (including the approved Indicative Usage Profile)
 - Tree removal/retention
 - Stage 1 RPAC content (being basement car parking, an aquatic centre with associated amenities, multi-purpose hall, auditorium with associated amenities and a research centre).

As the proposed modifications simply allow the Stage 1 development to be carried out in two phases, there are no additional or varied impacts and the Department need not notify the application for modification.

7.0 Planning assessment

Pursuant to Section 4.55(3) of the EP&A Act:

In determining an application for modification of a consent under this section, the consent authority must take into consideration such of the matters referred to in section 4.15(1) as are of relevance to the development the subject of the application.

An assessment of the Section 4.55(1A) proposal, using the considerations at section 4.15(1) of the EP&A Act, follows.

7.1 S.4.15(1)(a) State, regional and local plans

The following legislation, environmental planning instruments and development control plan are relevant to the Section 4.55(1A) proposal:

- Environmental Planning and Assessment Act 1979 (**EP&A Act**)
- State Environmental Planning (State and Regional Development) 2011 (**SEPP SRD**)
- State Environmental Planning Policy (Educational establishments and Child Care Facilities) 2017 (**SEPP Education and Child Care**)
- State Environmental Planning Policy No. 55 – Remediation of Land (**SEPP 55**)
- Waverley Local Environmental Plan 2012 (**Waverley LEP 2012**)
- Waverley Development Control Plan (**Waverley DCP**).

The Section 4.55(1A) proposal does not materially alter the compliance of the approved SSD with these Acts, SEPPs, Waverley LEP 2012 and Waverley DCP (noting that DCPs do not apply to SSDs).

7.2 S.4.15(1)(b) Impact on the environment

Key issues in the assessment of the approved SSD comprised:

- **Traffic, parking and transport:** The Section 4.55(1A) proposal will not alter the approved traffic, parking and access arrangements.
- **Impacts on adjoining residents, overshadowing, privacy, noise, lighting etc):** The impacts of the completed Stage 1 development will not change and the approved protection measures will be retained.
- **Built form and urban design:** The design changes will not be appreciable to even the most keen observer.
- **Heritage:** The heritage impacts of the completed Stage 1 development will not change.
- **Ecologically sustainable development (ESD):** The approved ESD strategies are retained
- **Accessibility:** Access Australia has confirmed that the Section 4.55(1A) proposal provides equitable access at each stage/phase of development (**Appendix D**).
- **BCA:** AED Group has confirmed that the Section 4.55(1A) proposal is capable of complying with the BCA at each stage/phase of development (**Appendix E**).
- **Construction impacts:** The proposed modifications would enable construction of Stage 1 in two phases. The Construction Environmental Management Plan, Traffic and Pedestrian Management Plan, Noise and Vibration Plan and Waste Management Plan required by Conditions C4 to C9 in the consent for SSD 6339 will appropriately address each phase of the Stage 1 construction activities. Other construction management conditions at Part D of the consent will apply to each phase of the Stage 1 construction works.

Given the above points, the Section 4.55(1A) proposal would have a minor environmental effect and maintains the environmental impacts of the approved development.

7.3 S.4.15(1)(c) Suitability of the site

As detailed throughout this SEE, the site is suitable to accommodate the Section 4.55(1A) proposal (in the same way that it is suitable for the development approved by the original consent for SSD 6339).

7.4 S.4.15(1)(d) Any submissions made in accordance with the Act or Regulations and S.4.15(1)(e) The public interest

If required, the Section 4.55(1A) application for modification will be notified/advertised in accordance with the Department's policy and submissions received will be considered in the assessment.

8.0 Conclusion

Given the merits of the Section 4.55(1A) proposal and the absence of any significantly adverse environmental effects, the Section 4.55(1A) proposal is considered worthy of consent.

The proposed modifications are minor in effect. As a consequence:

- The form and content of the Section 4.55(1A) proposal is substantially the same as the development approved by the original consent for SSD 6339
- The Section 4.55(1A) proposal will have a minimal (and satisfactory) impact upon the environment.

As the Section 4.55(1A) proposal satisfies the tests listed at Section 4.55(1A) of the EP&A Act, it is worthy of consent.

Appendix A

Section 4.55 Campus Plans, by Mayoh Architects

Appendix B

Section 4.55 Stage 1 RPAC Plans, by Mayoh Architects

Appendix C

Section 4.55 Landscape Plans, by Taylor Brammer

Appendix D

Access Report, by Access Australia

Appendix E

BCA Report, by AED Group

