

8 February 2018

15719

Carolyn McNally
Secretary
NSW Department of Planning and Environment
320 Pitt Street
SYDNEY NSW 2000

Attention: Michelle Niles

Dear Ms McNally,

**SECTION 96(1A) MODIFICATION APPLICATION TO SSD 7445
SITE 9, OLYMPIC BOULEVARD, SYDNEY OLYMPIC PARK (SSD 7445)**

This application has been prepared by Ethos Urban on behalf of Ecove Group Pty Ltd, seeking amendment to State Significant Development (SSD) 7445 pursuant to Section 96(1A) of the *Environmental Planning and Assessment Act, 1979* (EP&A Act) seeking consent to modify the internal configuration of the development, new plant and changes to the facade at Site 9, Olympic Boulevard Sydney Olympic Park address (the site).

The modification to the State Significant Development seeks consent for:

- internal reconfiguration of the ground floor;
- amendments and relocation of amenities on level 03;
- enclosing the façade of the plant rooms on level 07;
- enclosing the façade of the plant rooms and removal of showers and louvres on level 08;
- delete the eastern pavilion and reconfiguration of landscaping and new plant on level 09;
- reconfiguration of the plant on the roof;
- minor extension of the roof over the balcony of the penthouse on level 39;
- indicative locations of the ground floor intertenancy walls; and
- modification to the materials/finishes on the north-eastern façade of the ground floor.

The modifications to the showers will result in a reduction in the number of commercial showers from 13 to 8.

This application identifies the consent, describes the proposed modifications and provides an assessment of the relevant matters contained in Section 96(1A) of the EP&A Act. This application is accompanied by:

- Architectural Plans prepared by Bates Smart (**Attachment A**);
- List of proposed modifications prepared by Bates Smart (**Attachment B**);
- Landscape Plan prepared by Turf Design Studio (**Attachment C**);
- Plant Room Relocation Statement prepared by Insync Services Pty Ltd (**Attachment D**);
- Mechanical Service Statement prepared by ACES Air Conditioning Engineering Services Pty Ltd (**Attachment E**); and
- Acoustic Statement prepared by Renzo Tonin and Associates (**Attachment F**).

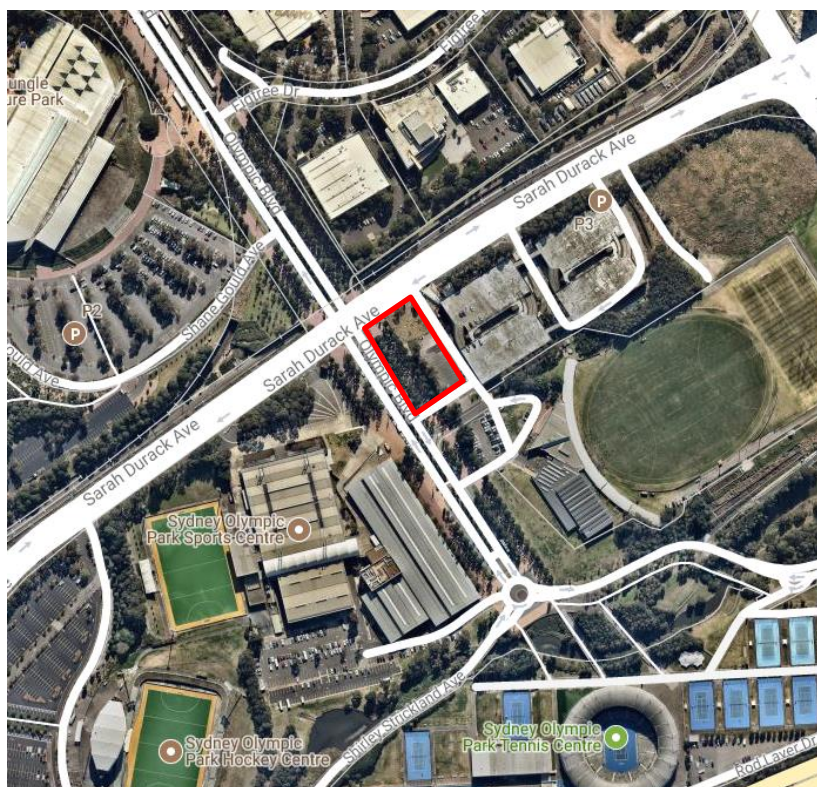
1.0 Consent Proposed to be Modified

State Significant Development 7445 was granted by the Executive Director of Key Sites and Industry Assessments from the NSW Department of Planning and Environment on 28 April 2017 for construction of a 39-storey mixed use development comprising 229 residential apartments, commercial and retail floor space, associated car parking spaces, a pedestrian through-site link and public domain improvements at Site 9, Corner Olympic Boulevard and Sarah Durack Avenue, Sydney Olympic Park. This Section 96 Modification Application is the first application seeking consent to modify the State Significant Development consent.

2.0 Site Analysis

The site is legally described as part Lot 2004 in DP 1192085. The land is owned by the Sydney Olympic Park Authority (SOPA). The site is rectangular in shape and has a total area of 4.071m². The site is known as Site 9 is located on the south-eastern corner of the Olympic Boulevard and Sarah Durack Avenue within Sydney Olympic Park traffic intersection. An aerial photograph providing the location of the site is shown at **Figure 1**.

To the north of the site across Sarah Durack Avenue runs the T7 Sydney Olympic Park railway line. Beyond the railway line is the Central Precinct. Adjacent to the site along the northeast boundary is the P3 public car park. To the south and southwest of the site across Sydney Olympic Boulevard are the Sydney Olympic Park Sports Centre and Netball NSW sporting facilities. To the west along Olympic Boulevard is the Sydney Olympic Park Aquatic Centre and other sporting venues.



The Site

Figure 1 – Site Context

Source: Near Maps and Ethos Urban

The Sydney Olympic Park Master Plan 2030 (2016 Review) Town Centre has been divided into nine precincts (see **Figure 2**):

- Central Precinct
- Central Sports Precinct
- Stadia Precinct
- Sydney Showground Precinct
- Parkview Precinct
- Boundary Creek Precinct
- Tennis Precinct
- Southern Sports Precinct
- Haslams Creek Precinct

The site is located within the Boundary Creek precinct.



Figure 2 – Sydney Olympic Park Masterplan 2030 (2016 Review) Precincts

Source: Sydney Olympic Park Authority

3.0 Proposed Modifications to the Consent

The proposed modification to the development consent comprises:

- internal reconfiguration of the ground floor;
- amendments and relocation of amenities on level 03;
- enclosing the façade of the plant rooms on level 07;
- enclosing the façade of the plant rooms and removal of showers and louvres on level 08;
- delete the eastern pavilion and reconfiguration of landscaping and new plant on level 09; and
- reconfiguration of the plant on the roof;
- minor extension of the roof over the balcony of the penthouse on level 39;
- indicative locations of the ground floor intertenancy walls; and
- modification to the materials/finishes on the north-eastern façade of the ground floor.

The modifications to the showers will result in a reduction in the number of commercial showers from 13 to 8.

3.1 Modifications to the Approved Development

This modification to State Significant Development 7445 consent seeks consent for various minor changes to the approved building as a result of preparing for construction of the development and the need to locate services in specific locations. These modifications are detailed below and illustrated in the revised Architectural Plans prepared by Bates Smart at **Attachment A** and revised Landscape Plan prepared by Turf Design at **Attachment C**.

Reconfiguration of floors

Ground Floor

This application seeks to reconfigure the plant rooms to align with the preferable and optimal service requirements. The residential bike store has been relocated from the southern section of the ground floor (as demonstrated in **Figure 3**) to the northern section of the ground floor (as demonstrated in **Figure 4**). The locations of the retail intertenancy walls on the ground floor are subject to confirmation (as shown in **Figure 4**).

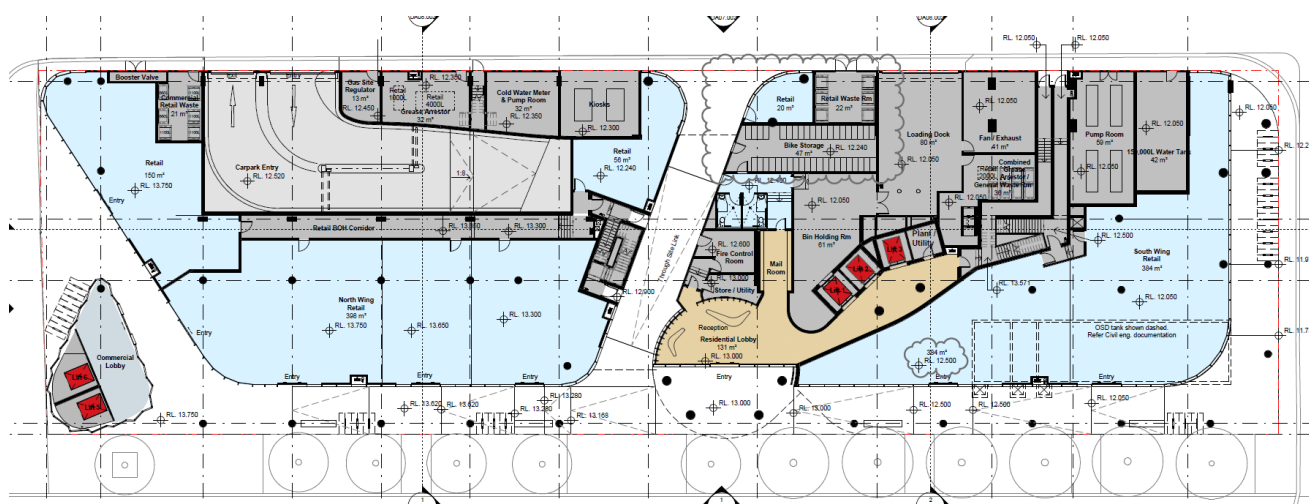


Figure 3 – Approved layout of the Ground Floor

Source: Bates Smart

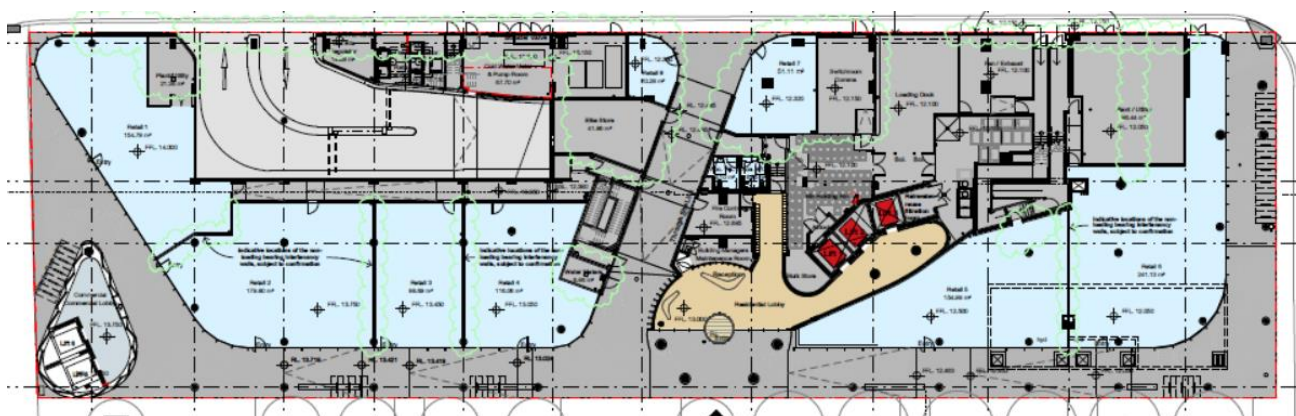


Figure 4 – Proposed layout and extent of indicative north eastern façade change on the Ground Floor

Source: Bates Smart

Level 03

The commercial amenities on Level 03 have been relocated from the western wall as included in **Figure 5** to the eastern wall as included in **Figure 6**.

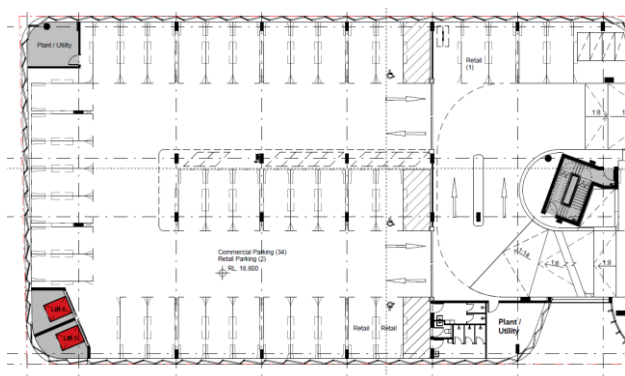


Figure 5 – Approved location of amenities on level 03

Source: Bates Smart



Figure 6 – Proposed location of amenities on level 03

Source: Bates Smart

Level 08

Six commercial showers have been deleted and replaced with toilets.

Roof on Level 09

The reconfiguration of the communal roof top includes deleting the eastern pavilion (shown in **Figure 7**), two new plant rooms, minor modifications to the benches and landscaping (shown in **Figure 8** and **9**). In addition, the application is seeking to modify the proximity to railway plan to amend the RL 42.8 of the northern roof to be consistent with the approved RL of 42.6 northern roof of the podium and amend RL 39.6 of the parapet north to be consistent with the approved RL of 39.42.

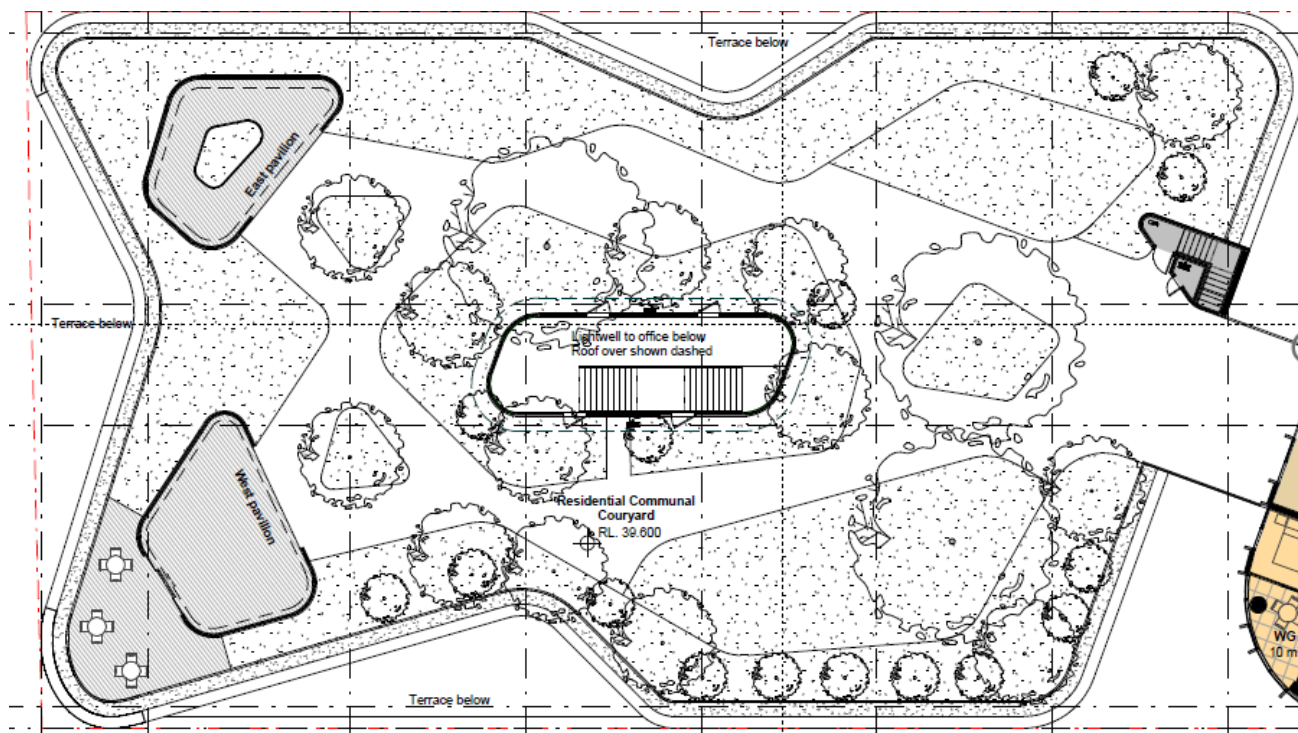


Figure 7 – Approved location of the eastern pavilion on the roof of level 09

Source: Bates Smart

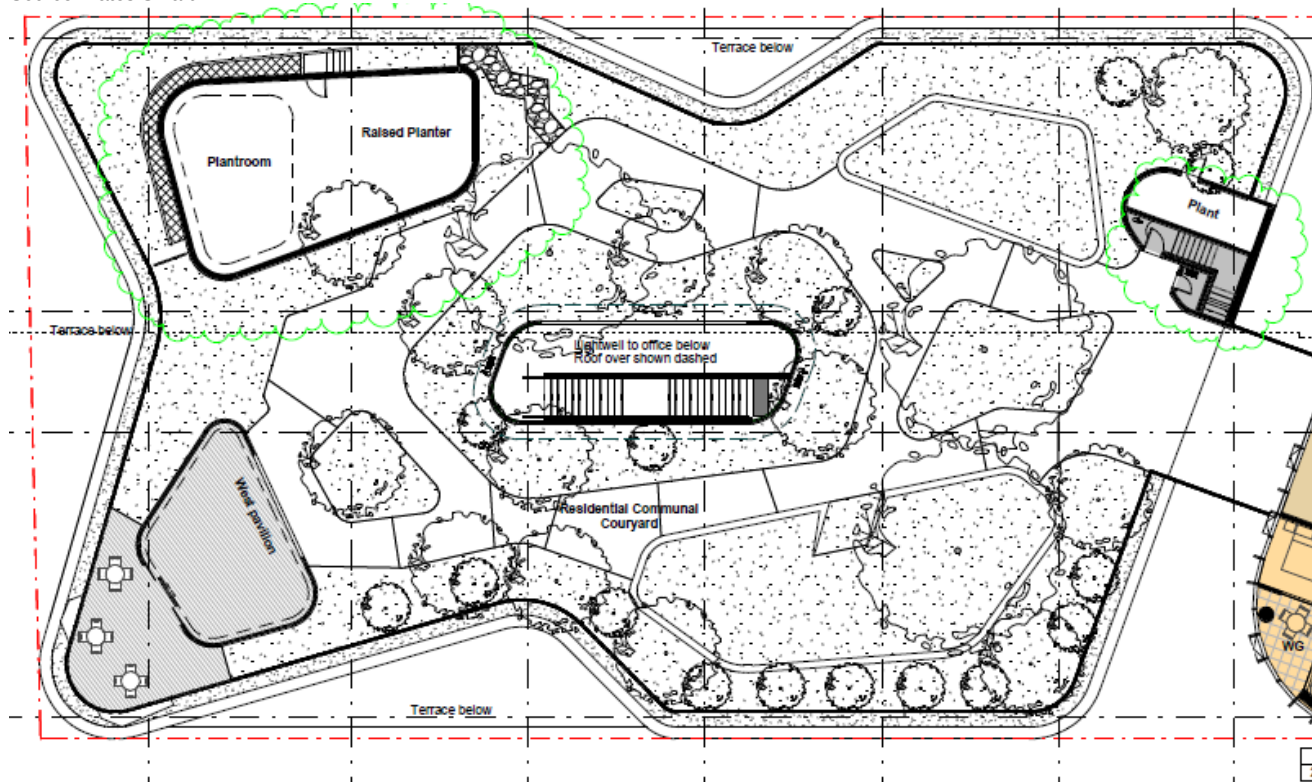


Figure 8 – Proposed location of the new plant room on the roof of level 09

Source: Bates Smart



Figure 9 – Proposed location of the new plant room on the roof of level 09

Source: Bates Smart

Façade

Level 07 and 08

The façade treatment on Level 07 and 08 (shown in **Figure 11** and **13**) will be extended to screen the plant room (shown in **Figure 12** and **14**) to be consistent with the approved façade.

Elevations

Clarification of the extent of the louvres on the façade to be consistent with the approved facade (shown in **Figure 15**) and indicative finish/material of the north eastern façade (shown in **Figure 16**). The louvres for the air conditioning plant room on Levels 07 to 37 are proposed to be fixed open to allow for ventilation for the air conditioning plant as shown in **Figure 10** on the Level 9 floor plan. The proposed materials/finishes of the façade of the north eastern elevation of the ground floor are indicative, however the materials are expected to comprise of a combination of glass (shown as finish/material 3 on the schedule) and metal cladding/louvres (shown as finish/material 10 on the schedule).

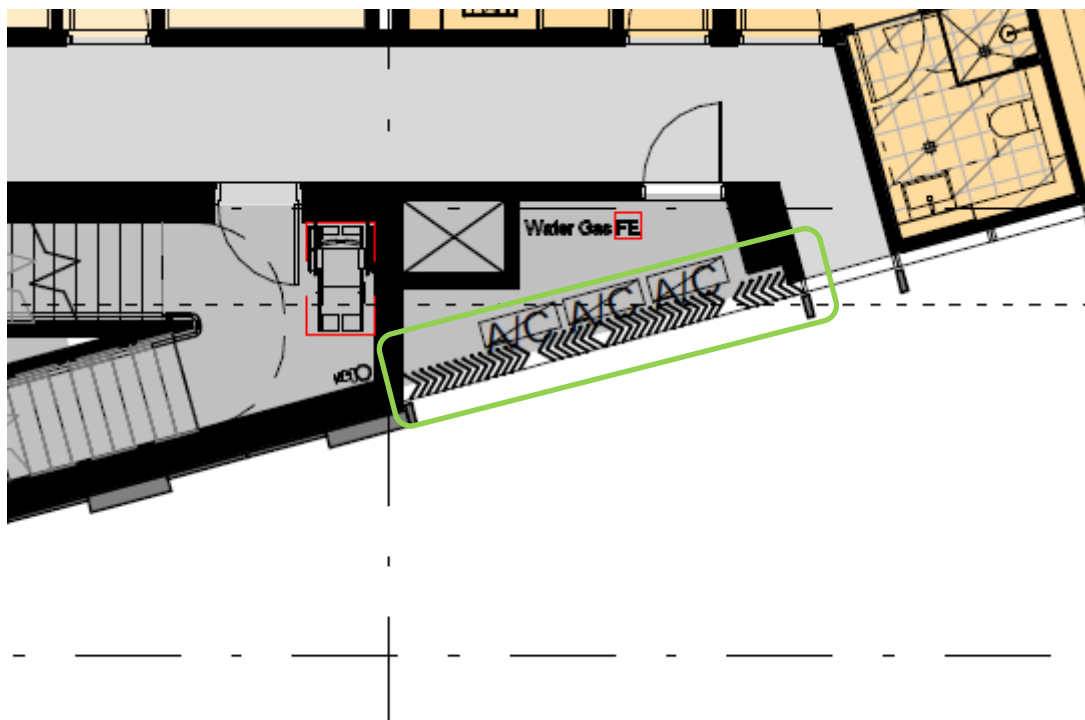


Figure 10 Proposed open aluminium louvres to the plant room on Level 09

Source: Bates Smart and Ethos Urban

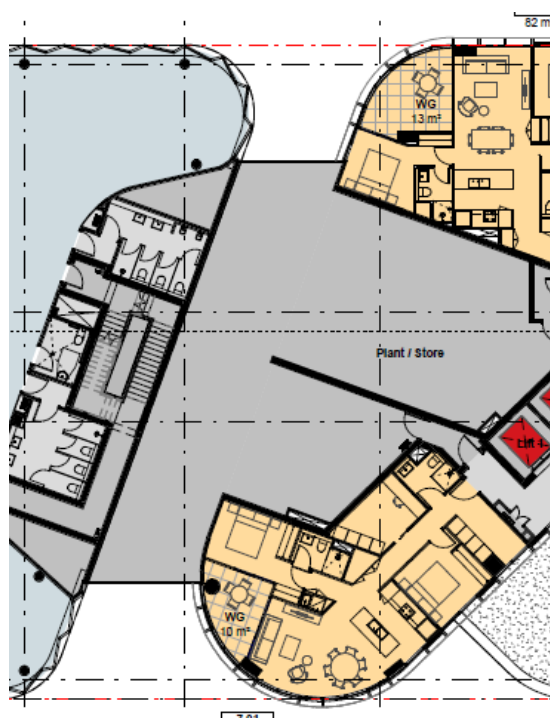


Figure 11 – Approved plant on level 07

Source: Bates Smart



Figure 12 – Proposed screen to enclose plant on level 07

Source: Bates Smart

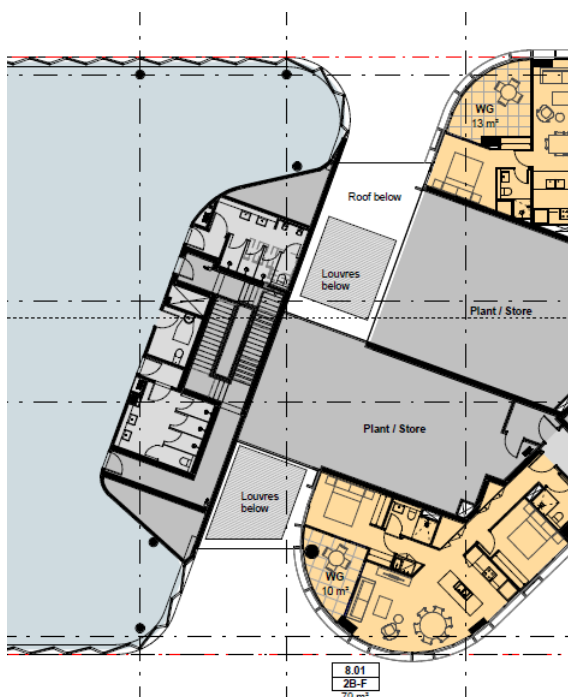


Figure 13 – Approved amenities and exposed plant and louvres below on level 08

Source: Bates Smart

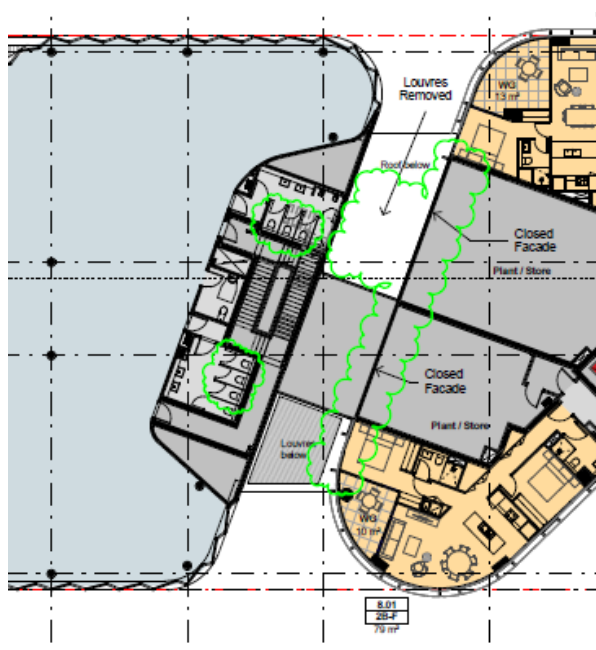


Figure 14 – Proposed amenities and screen to enclose plant and removal of louvres on level 08

Source: Bates Smart

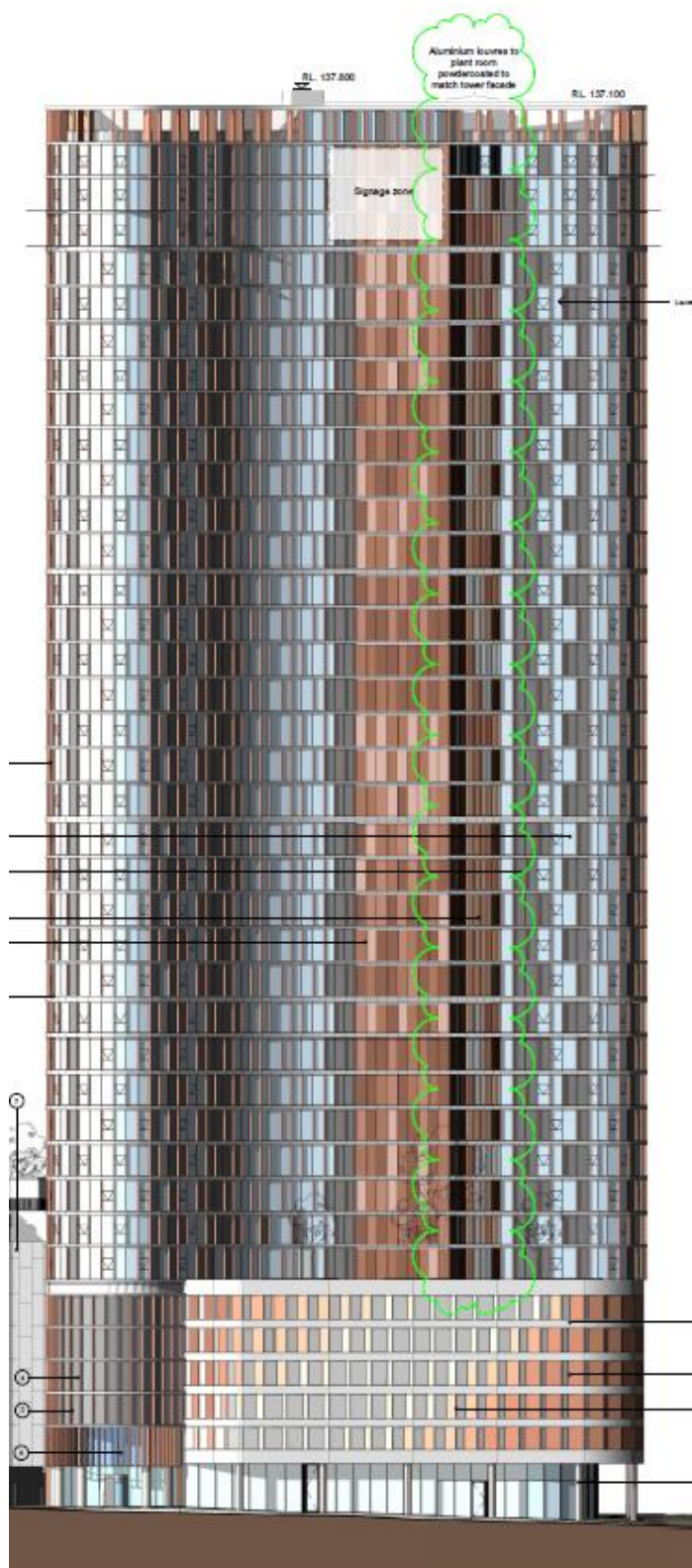


Figure 15 – Proposed fixed open aluminium louvres to the plant room on Levels 7 to 37 on the south west elevation

Source: Bates Smart

Source: Bates Smart

Services on the roof and level 39

The proposal includes reconfiguration of the approved services on the roof and on level 39 (shown **Figure 17**), the reconfiguration of plant on level 39 consists of mechanical plant and the reconfiguration of the plant on the roof consists of vent pipes and mechanical equipment (shown in **Figure 18**).

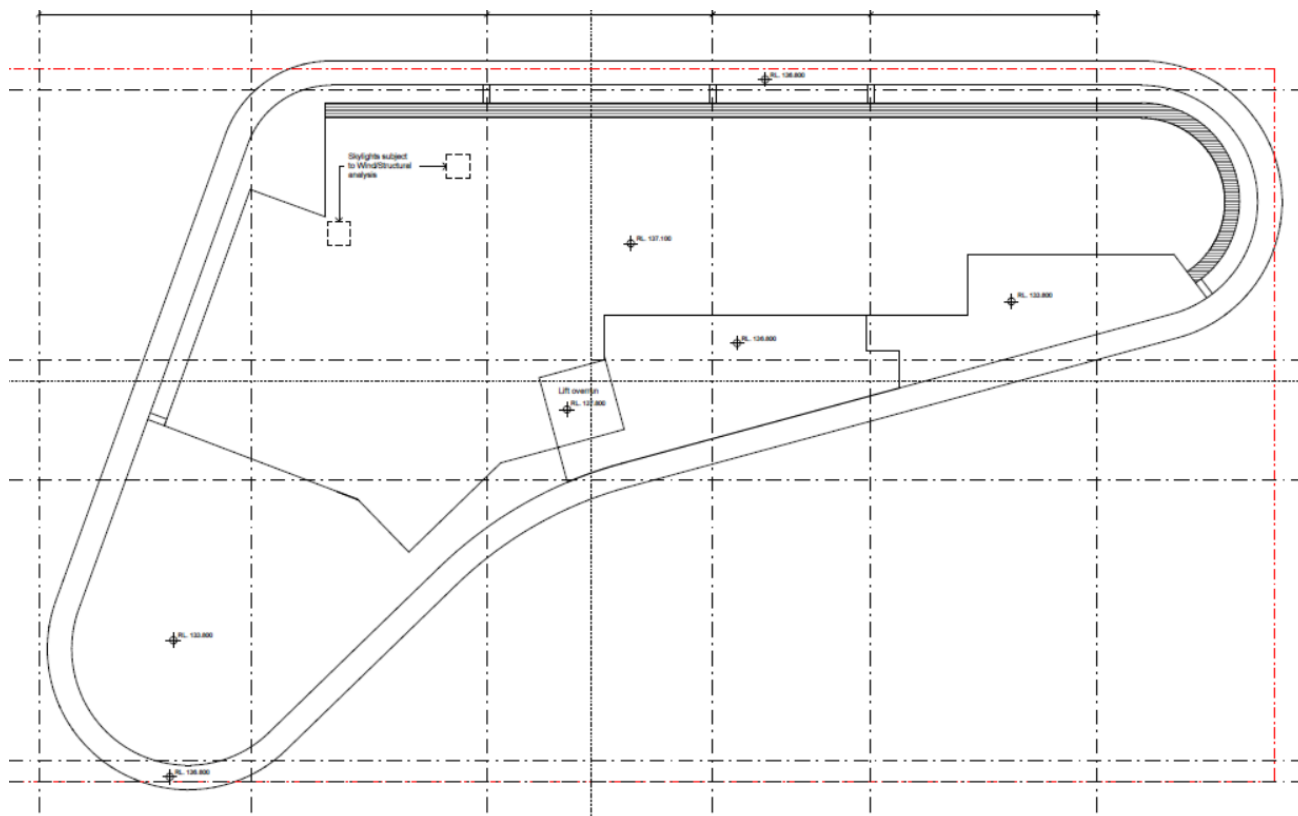


Figure 17 – Approved Services on level 39 and on the roof

Source: Bates Smart

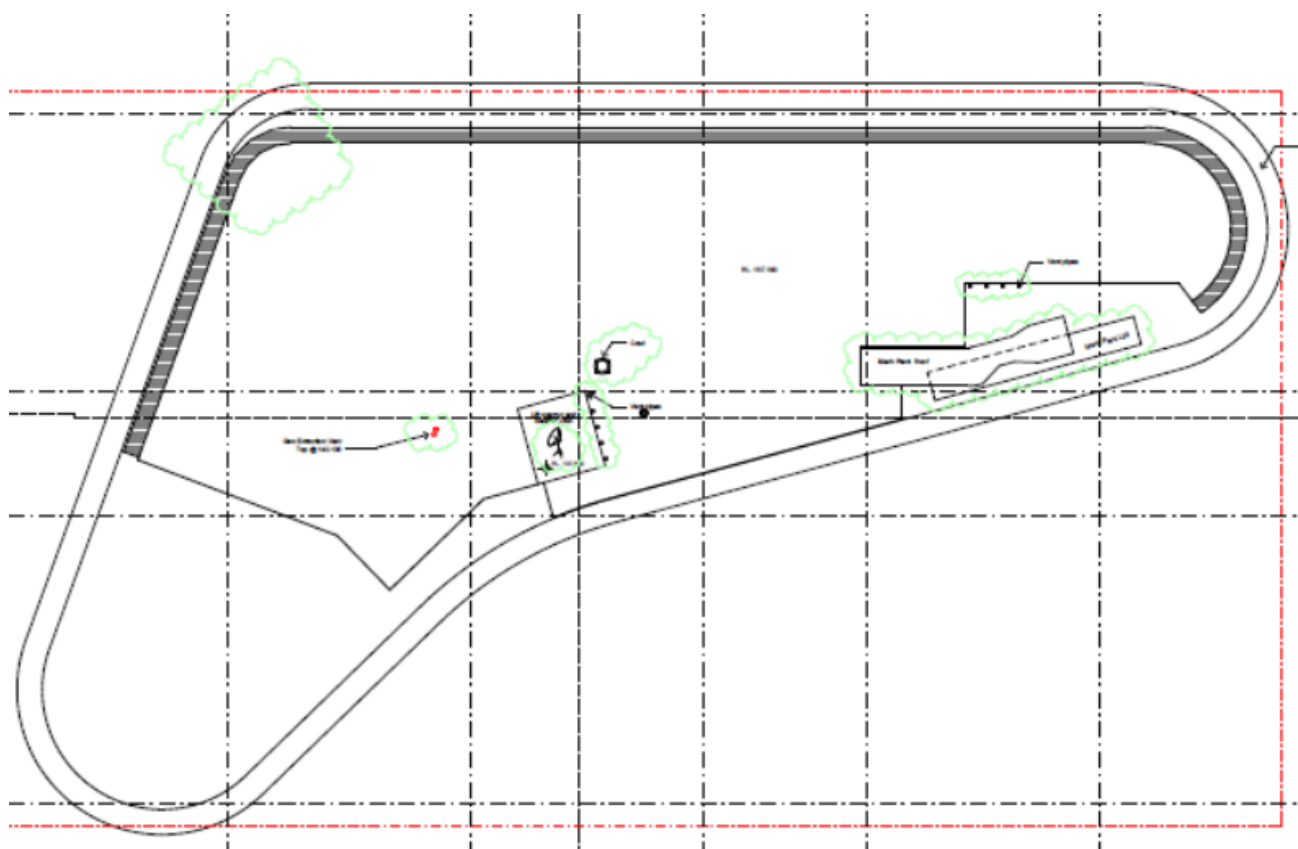


Figure 18 – Proposed Services on level 39 and extension of the roof

Source: Bates Smart

3.2 Modifications to Conditions

The proposed modifications described above necessitate amendments to the consent conditions which are identified below. Words proposed to be deleted are shown in ~~bold strike through~~ and words to be inserted are shown in **bold italics**.

Development in Accordance with Plans and Documents

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

- a) Environmental Impact Statement, Site 9, Sydney Olympic Park prepared by JBA and dated April 2015;
- b) SSD 7445: Response to Submissions, Site 9, Sydney Olympic Park, prepared by JBA and dated October 2016;
- c) SSD 7445: Response to Submissions Addendum, Site 9, Sydney Olympic Park, prepared by JBA and dated February 2017;
- d) *The Section 96(1A) Modification Application (SSD 7445 MOD 1), accompanying Environmental Impact Statement dated 8 February 2018 prepared by Ethos Urban;***
- e) following drawings, except for:
 - i) any modifications which are Exempt or Complying Development;
 - ii) as otherwise provided by the conditions of this consent; and
- f) the conditions of this consent.

Architectural (or Design) Drawings prepared by Bates Smart:

Drawing No.	Revision	Name of Plan	Date
DA01.001	D G	Site Plan	24/01/2017 05/02/2018

Architectural (or Design) Drawings prepared by Bates Smart:			
DA01.002	B D	Proximity to Rail Corridor Site Plan + Building Envelopes	20/07/2016 27.11.17
DA01.003	B	Proximity to Rail Corridor Aerial Photograph	20/07/2016
DA02.001	D L	General Arrangement Plan Ground	24/01/2017 05/02/2018
DA02.002	C	General Arrangement Plan Level 02	25/08/2016
DA02.003	C G	General Arrangement Plan Level 03	24/01/2017 13.12.17
DA02.004	C	General Arrangement Plan Level 04	24/01/2017
DA02.005	C	General Arrangement Plan Level 05	24/01/2017
DA02.006	C	General Arrangement Plan Level 06	24/01/2017
DA02.007	B F	General Arrangement Plan Level 07	20/07/2016 18.12.17
DA02.008	B E	General Arrangement Plan Level 08	20/07/2016 12.12.17
DA02.009	C E	General Arrangement Plan Level 09	24/01/2017 20.11.17
DA02.010	B	General Arrangement Plan Level 10,12,14	20/07/2016
DA02.011	B	General Arrangement Plan Level 11,13	20/07/2016
DA02.015	B	General Arrangement Plan Level 15,17, 19	20/07/2016
DA02.016	B	General Arrangement Plan Level 16,18	20/07/2016
DA02.020	B	General Arrangement Plan Level 20,22,24,26	20/07/2016
DA02.021	B	General Arrangement Plan Level 21,23, 25	20/07/2016
DA02.027	B	General Arrangement Plan Level 27,29, 31, 33, 35	20/07/2016
DA02.036	B	General Arrangement Plan 36-37	2007/2016
DA02.038	B	General Arrangement Plan 38	20/07/2016
DA02.039	B	General Arrangement Plan 39	20/07/2016
DA02.040	A H	General Arrangement Plan Roof Plan	20/07/2016 05/02/2018
DA07.001	C H	Building Elevations Southwest	25/08/2016 27.11.17
DA07.002	B H	Building Elevations NorthEast	20/07/2016 05/02/2018
DA07.003	B G	Building Elevations Northwest and Southeast	20/07/2016 27.11.2017
DA08.001	B F	Building Sections A-A	20/07/2016 27.11.17
DA08.002	B	Building Sections B-B, C-C	20/07/2016
DA10.001	B	Tower Façade Conditions 01-04 – Indicative Detail Sections	20/07/2016
DA50.001	B	Shadow Diagram Winter Solstice June 21	20/07/2016
Landscape (or Design) Drawings prepared by Turf Design Studio:			
Drawing No.	Revision	Name of Plan	Date
L-DA-5	C	Tree Management Plan	July 2016
L-DA-6	C	Landscape Plan Public Domain	July 2016
L-DA-7	C	Landscape Plan Level 7 – South Podium	July 2016

Architectural (or Design) Drawings prepared by Bates Smart:			
L-DA-8 LA-TURF SECTION 96-1A	C ISSUE 3	Landscape Plan Level 9 – North Podium Level 9 Podium (N) Landscape Plan	July 2016
L-DA-9	C	Sections Public Domain	July 2016
L-DA-10	C	Sections Level 7 – South Podium	July 2016
L-DA-11	C	Sections Level 9 – North Podium	July 2016
L-DA-12	C	Views Public Domain	July 2016
L-DA-13	C	Views Level 9 – North Podium	July 2016
L-DA-14	C	Planting Level 7 – South Podium	July 2016
L-DA-15	C	Planting Level 9 – North Podium	July 2016
L-DA-16	C	Materials and Landscape Elements Public Domain	July 2016
L-DA-17	C	Materials and Landscape Elements Level 9 – North Podium	July 2016
L-DA-18	C	Typical Details Public Domain	July 2016
L-DA-19	C	Typical Details Podium Landscapes	July 2016

Acoustic Compliance

E4. Prior to issue of a relevant Occupation Certificate, evidence shall be submitted to the Certifying Authority demonstrating compliance with all recommendations of the Noise and Vibration Report (addendum), prepared by Renzo Tonin, submitted as part of the EIS **as modified by the Acoustic Statement Prepared by Renzo Tonin and associated, submitted as part of MOD 1** and the development achieves compliance with the requirements of State Environmental Planning Policy (Infrastructure) 2007 and other guidelines applicable to the development.

Bicycle Parking and Facilities

B14. A minimum of ~~13~~ **8** showers shall be provided for the commercial and retail tenancies in accordance with the application. Details shall be submitted to the satisfaction of the Certifying Authority prior to the issue of the relevant Construction Certificate for services and finishes works.

4.0 Substantially the same development

Section 96(1A) of the EP&A Act states that a consent authority may modify a development consent if “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)”.

The development, as proposed to be modified, is substantially the same development as that originally approved, in that:

- The proposed works are to improve the services required by the building by locating plant rooms in specific locations for alignment with where services are to be provided;
- The aesthetics and appearance of the development remain unchanged when viewed from the public domain and no change in building envelope or density is proposed; and
- The proposed modifications represent minor building changes that are typical during the construction phase and that do not give rise to any adverse environmental impacts.

5.0 Environmental assessment

Section 96(1A) of the EP&A Act states that a consent authority may modify a development consent if “it is satisfied that the proposed modification is of minimal environmental impact”. Under Section 96(4) the consent Authority must also take into consideration the relevant matters to the application referred to in Section 79C (1) of the EP&A Act.

The following assessment considers the relevant matters under Section 79C (1) and demonstrates that the development, as proposed to be modified in respect to the reconfiguration of the ground floor and level 03 and 08, new plant on Level 09, 39 and on the roof and façade changes, will be of minimal environmental impact.

The EIS submitted with the original SSDA addressed the likely impacts of the development, including:

- Compliance with the relevant Strategic and Statutory Plans and Policies
- Permissibility
- Design Excellence
- Consistency with the Sydney Olympic Park Master Plan 2030 (2016 Review)
- Built form and Urban Design
- Environmental and Residential Amenity
- Landscaping and Public Domain Management
- Transport and Accessibility
- Ecologically Sustainable Development
- Acoustic Impacts
- Drainage and Flooding
- Waste Management
- Construction Management
- Contributions
- Site Suitability
- Public Interest

The planning assessment of the proposed modified development remains generally unchanged with the respect to the above matters. The following matters however warrant further assessment.

5.1 Residential Amenity

The proposed modifications include the relocation of the commercial building plant specifically the mechanical equipment from the plantroom on level 07 and 08 to the roof of level 09. The approved location in the plantroom on level 08 would discharge exhaust air vertically into the podium level (level 09) above. Renzo and Associates have prepared an acoustic statement in support of the relocation of the plant from level 08 to the roof of level 09 (provided in **Attachment F**). The plantroom discharge openings are located 2m to 3m from the nearest apartments, (above and beside), that could impact on the amenity of the apartments should the design not be modified as proposed.

Furthermore, the apartment balconies on level 09 and adjacent level 07 and 08 that overlook the plant room could be adversely impacted by the mechanical plant noise, heating and cooling, due to the proximity of the discharge openings and the total number of condensers in the plant room. The approved location of the mechanical plant (shown in **Figures 8, 11 and 13**) would require the extension of the acoustic treatment to the individual condensers. In addition to the extensive acoustic treatment to the plant room, the efficiency of the plant could potentially be impeded. The proposed modifications include deleting the eastern pavilion on the roof of Level 9 (shown in **Figure 7**) to accommodate the new plant room (shown in **Figures 8 and 9**), which will be located approximately 45m from

the nearest apartment balcony. Insync Services have prepared a statement (provided in **Attachment D**) on the building services, concluding that the proposed air conditioning condensers removes the requirement for commercial maintenance access through the residential portion of the development. A Mechanical Service Statement prepared by Air Conditioning Engineering Services Pty Ltd (provided in **Attachment E**), has advised that the approved location would result in hot air discharging in summer and cold air discharging in winter, impacting on residential balconies on several levels. The proposed location on the roof of Level 09 (as shown in **Figures 8 and 9**) will have minimal requirements for acoustic treatment to prevent any potential noise to the nearest residential and commercial receptors, removal of the commercial maintenance access from the residential portion of the building and removal of the air discharging from the condensers. The relocation of the air conditioning condensers will significantly improve the amenity of the northern residential apartments on Level 07, 08 and 09.

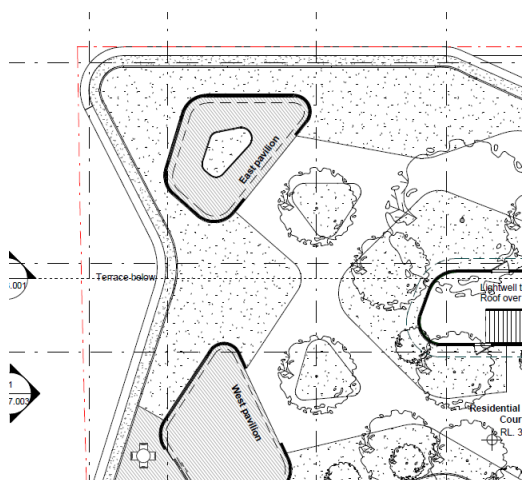


Figure 19 – Approved East Pavilion on Roof Level 09

Source: Bates Smart

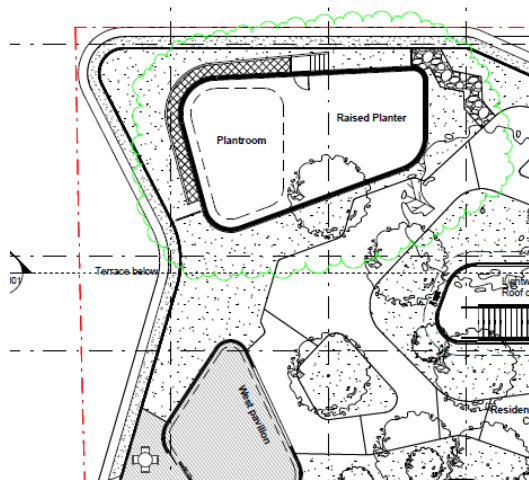


Figure 20 – Proposed Plant Room and Raised Planter on Roof Level 09

Source: Bates Smart

5.2 Ground Floor

The proposed reconfiguration of the plant on the ground floor includes changes to plant rooms and retail tenancies and minor changes to openings. The reconfiguration has resulted from the progress of the construction phase of the building to accommodate compliance with spatial and blast zones, minimum cable distances, minimise in ground services and compliance with the national construction code and authority requirements. The locations of the east-west through site link, safety and vehicle access are not being modified. The indicative locations of the non-load bearing intertenancy retail walls are subject to confirmation. The indicative locations are not modifying the approved retail gross floor area or the active street frontages. The changes to the plant are within the approved building envelope and the openings are not considered to result in any adverse impacts.

5.3 Built Form and Urban Design

The proposed modifications are generally within the approved building envelope with a minor change to delete the eastern pavilion, new plant rooms on Level 09 and additional louvres. The minor modifications to the façade are to screen the plant by enclosing façade of the plant rooms on Level 07 and 08. The proposed continuation of the facade will be integrated into the approved design by matching with the approved façade (as shown in **Figure 15**).

The proposed materials/finishes of the façade of the north eastern elevation of the ground floor are indicative, however the materials are expected to comprise of a combination of the approved glass (shown as finish/material 3 on the schedule) and metal cladding/louvres (shown as finish/material 10 on the schedule). The proposed indicative combination of the materials/finishes aims to provide additional visual interest to the streetscape. The proposed external modifications are generally within the approved envelope and will not result in any significant visual impacts.

5.4 Bicycle Storage, Amenities, Car Parking and Traffic

The proposal is relocating the residential bicycle storage on the ground floor and relocating the amenities on Level 03, 07 and 08 within the approved building envelope. The approved residential bicycle storage on the ground floor is being relocated from the southern portion (shown **Figure 3**) of the ground floor to the northern portion (shown in **Figure 4**) of the ground floor. The proposed residential bicycle storage located in the northern portion of the ground floor will be accessed from a door in the through site link providing a safe and clear entry for visitors, staff and residents. The proposal is not seeking to modify the conditions referring to the total maximum of 353 car and motor cycle parking and minimum requirement of 399 bicycle spaces. The proposed modifications are located within the approved envelope and will not increase the requirements for on-site car parking and will not increase the overall traffic and trip generation beyond the approved.

The commercial amenities on Level 03 have been relocated from the western wall as included in **Figure 5** to the eastern wall as included in **Figure 6**. The total number commercial showers have also been reduced from 13 to 8. Condition 14B under Bicycle Parking and Facilities requiring a minimum of 13 commercial showers is simply a reflection of the approved plans. The approved plans show a total of 13 showers comprising of 5 showers on level 03, 2 showers on level 07 and 6 showers on level 08.

The future tenant of levels 07 and 08, the Sydney Olympic Park Authority (SOPA) has advised that the showers provided are surplus and are not required on level 08. The total number amenities on level 03, 07 and 08 has been reconfigured resulting in a reduction of the showers from 13 to 8, with the 6 commercial showers being provided on level 03 (as shown in **Figure 6**) and 2 showers on level 07 (as shown in **Figure 11** and **12**). The proposed reconfiguration of the commercial showers is located within the approved envelope and will adequately service the commercial area within the building.

5.5 Communal Rooftop on Level 09

The proposed modifications include reconfiguration of the rooftop, new plant room on Levels 09 and minor changes in the RLs on the proximity to the railway plan to be consistent with the approved RLs of the roof north and parapet north. There are minor changes to the benches, additional planting, modification to the outdoor seating area material and reconfiguration of the path. The approved use of the communal rooftop and the access will not be modified. The proposed modifications to the communal rooftop area are to accommodate the additional plant rooms, in addition to improving the amenity of the outdoor communal area. The application is seeking to modify the proximity to railway plan to amend the RL 42.8 of the northern roof on the be consistent with the approved RL of 42.6 northern roof of the podium and amend RL 39.6 of the parapet north to be consistent with the approved to RL 39.42. The approved height of podium is not being modified. The proposed modifications to the communal rooftop will not give rise to any adverse amenity impacts or substantially change the visual appearance of the approved building.

5.6 Minor extension of the balcony roof of the penthouse on level 39

The proposed modifications include a minor extension to the roof of the penthouse on Level 39 (shown in **Figure 17**) to cover the northern part of the balcony garden (shown in **Figure 18**). The minor extension to the roof is in keeping with the approved roof alignment and the setback is consistent with the approved roof, which is setback from the building edge. The approved parapet includes fins around the penthouse on Level 39 to assist in the parapet reading as an architectural feature rather a continuation of the building. We note that extending the roof form will not impact on satisfying Condition B2 (provided below). The minor extension to the roof form will not give rise to any changes to the visual presentation of the building noting that the level 39 parapet screens the penthouse and proposed roof extension.

Amended Architectural Plans

B2. Prior to the issue of a Construction Certificate, the following amended architectural plans/elevations and documentation shall be prepared for review and endorsement of the Sydney Olympic Park Design Review Panel and submitted to the Secretary:

- (a) the materiality and design of the parapet shall be redesigned so that it is expressed as an architectural feature, clearly distinct from the residential levels below, and does not read as a continuation of the building façade; and*

- (b) *a visual analysis demonstrating that the redesigned parapet in accordance with (a) above screens the apartment on Level 39, so that it will not be readily visible and will not read as a legible part of the building from surrounding streets and future developments immediately to the north and south.*

5.7 Sydney Olympic Park Master Plan 2030 (2016 Review)

The proposed modifications are minor changes to the internal configuration of the levels and an additional rooftop plant. The approved land uses and pedestrian and vehicle access are not being modified. The proposed modifications do not change the approved development's compliance with the SOP Master Plan 2030 (2016 Review).

6.0 Conclusion

The proposed modifications to the internal reconfiguration, extension of the balcony roof for the penthouse, new plant and changes to the façade and landscaping are demonstrated to result in minimal environmental impact. Further, the modifications improve access to services to the building and the amenity of the apartments.

In accordance with Section 96(1A) of the EP&A Act, the NSW Department of Planning and Environment may modify the consent as:

- the proposed modification is of minimal environmental impact; and
- substantially the same development as development for which the consent was granted.

In light of the above, we recommend that the NSW Department of Planning and Environment approve the proposed modifications as described above. We trust that this information is sufficient to enable a prompt assessment of the proposed modification request as above. Should you have any queries about this matter, please do not hesitate to contact either myself or Daniel West on (02) 9956 6962 or at cpon@ethosurban.com or dwest@ethosurban.com.

Yours sincerely,



Candice Pon
Urbanist