

10 August 2020

16009

Jim Betts
Planning Secretary
Department of Planning, Industry and Environment
4 Parramatta Square
12 Darcy Street, Parramatta NSW 2150

Attention: Amy Watson

Dear Amy,

**SECTION 4.55(1A) MODIFICATION APPLICATION - STATE SIGNIFICANT DEVELOPMENT 7484:
SANDSTONE PRECINCT MODIFICATION 10, 23-33 & 35-59 BRIDGE STREET, SYDNEY**

This modification application is submitted to the Department of Planning, Industry and Environment (DPIE) pursuant to Section 4.55(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act) to modify State Significant Development 7484 (SSD 7484) relating to the adaptive reuse of the Sandstone Precinct (Education and Lands Buildings) for tourist and visitor accommodation.

The proposed modifications include minor design development changes to the internal courtyard façade at Levels 2 through 9 and external façade design at Levels 6 through 9, associated with the Education Building. It is also proposed to amend Condition F24 relating to building name and numbering signage.

This application identifies the consent, describes the proposed modifications and provides an assessment of the relevant matters contained in section 4.55(1A) of the EP&A Act. This application is accompanied by:

- Amended Architectural Plans prepared by Webber (**Attachment A**);
- Façade Advice prepared by JML Craft (**Attachment B**);
- Addendum Heritage Impact Statement prepared by Urbis (**Attachment C**);
- Façade Curved Glass Advice prepared by TTW (**Attachment D**);
- Design Statement prepared by Make (**Attachment E**); and
- DRP Advice No. 13 (**Attachment F**).

1.0 Consent proposed to be modified

The Stage 2 detailed development application (SSD 7484), the subject of this modification application, was approved on 24 April 2018 by DPE and granted consent for the adaptive reuse of the Sandstone Precinct for tourist and visitor accommodation, including:

- demolition of existing improvements and alterations to the Lands and Education Buildings (as shown in the approved plans only)
- maximum gross floor area (GFA) of 31,633m², with:
 - 10,918m² in the Lands Building
 - 20,715m² in the Education Building
- maximum of 253 hotel rooms, with:
 - 61 in the Lands Building
 - 192 in the Education Building

- fit out of ancillary guest and visitor facilities
- improvements and construction of a roof extension to the Lands Building, with a maximum height of RL 38.00
- construction of a roof extension to the Education Building, with a maximum height of RL 60.03

The SSD 7484 consent has been modified eight times to date.

2.0 Proposed modifications to the consent

The proposed modifications to the development consent comprises the following:

- Minor internal courtyard changes on the Education Building:
 - Changes to the radius of corner glass to 1500mm on the eastern side
 - Perforated cladding added in corner on the eastern side on Level 9
 - Internal corners on western side changed from curved to square
 - Relocation of Level 9 louvres on the western side and replacement with glass spandrels
 - Replaced glazed spandrel panel with perforated cladding panels and louvres (where required) from Levels 2 through 8 on western side
 - New awning hoods on Level 8, and reduction of awning hood widths on Levels 2 through 7, on the eastern side
- Minor changes to the external façade of the Education Building
 - Corner glass panels of rooftop extension changed to 1500mm radius with minor mullion adjustment to reflect the change on all elevations for Levels 6 through 8
 - Material change from perforated fluted cladding to solid fluted cladding on Level 9 northern elevation from corner to corner
 - Relocated access door and perforated panels and louvres on Level 9 eastern elevation
 - Louvre added on western elevation at Level 9 with solid fluted panel changed to perforated fluted panel
 - Minor step added to roof overhang on southern elevation
- Changes to the wording of Condition F24 relating to building name and number signage to address inconsistency in the current wording of the condition and ensure the most appropriate outcome is achieved from a streetscape, heritage and wayfinding perspective.

The proposed design changes represent further design development responding to construction and mechanical requirements, including confirmation (**Attachments B and D**) that the previously proposed 600mm radius on the glass corners cannot be manufactured by a supplier either locally or internationally due to limitations on glass ovens.

A brief description of the proposed modifications for each level is presented in **Table 2**. The modifications result in an overall reduction in gross floor area from 18,512m² to 18,510m², a reduction of 2m². For further details on the proposed changes refer to the revised architectural drawings included at **Attachment A**.

Table 1 Modifications to the development by level

Level	Description of modification
Level 2 Level 3 Level 4 Level 5	<ul style="list-style-type: none"> Internal courtyard curved glass radius changed to 1500mm on eastern side Awning reduced in width on eastern side Internal courtyard curved glass changed to square corner on western side Backpan added to glass panels on western side and perforated cladding added to spandrel to conceal louvres
Level 6	<ul style="list-style-type: none"> Internal courtyard <ul style="list-style-type: none"> Internal courtyard curved glass radius changed to 1500mm on eastern side Awning reduced in width on eastern side Internal courtyard curved glass changed to square corner on western side Backpan added to glass panels on western side and perforated cladding added to spandrel to conceal louvres External façade <ul style="list-style-type: none"> Curved glass corners changed to 1500mm radius on northern elevation Mullion spacing modified in response to curve radius on northern, eastern and western elevations
Level 7	<ul style="list-style-type: none"> Internal courtyard <ul style="list-style-type: none"> Internal courtyard curved glass radius changed to 1500mm on eastern side Awning reduced in width on eastern side Internal courtyard curved glass changed to square corner on western side Backpan added to glass panels on western side and perforated cladding added to spandrel to conceal louvres External façade <ul style="list-style-type: none"> Curved glass corners changed to 1500mm radius on northern and southern elevation Mullion spacing modified in response to curve radius on all elevations Guest room ensuite layout modified in south-eastern corner
Level 8	<ul style="list-style-type: none"> Internal courtyard <ul style="list-style-type: none"> Internal courtyard curved glass radius changed to 1500mm on eastern side Awning reduced in width on eastern side Internal courtyard curved glass changed to square corner on western side Backpan added to glass panels on western side External façade <ul style="list-style-type: none"> Curved glass corners changed to 1500mm radius on northern and southern elevation Mullion spacing modified in response to curve radius on all elevations Guest room ensuite layout modified in south-eastern corner room and western tower room
Level 9	<ul style="list-style-type: none"> External façade <ul style="list-style-type: none"> Northern elevation material change from fluted perforated panel to fluted solid panel Curved corners changed to 1500mm radius on northern elevation Mullion spacing modified in response to curve radius on northern, western and eastern elevations Access door and perforated panels and louvres relocated on the eastern elevation
Roof	<ul style="list-style-type: none"> Added step on roof (rain screen panelling) Tiling and cooling tower layout modified



Figure 1 The proposed Mod 10 changes (left) for the internal courtyard on Levels 2 through 5, and the approved Mod 7 design (right)

Source: Webber

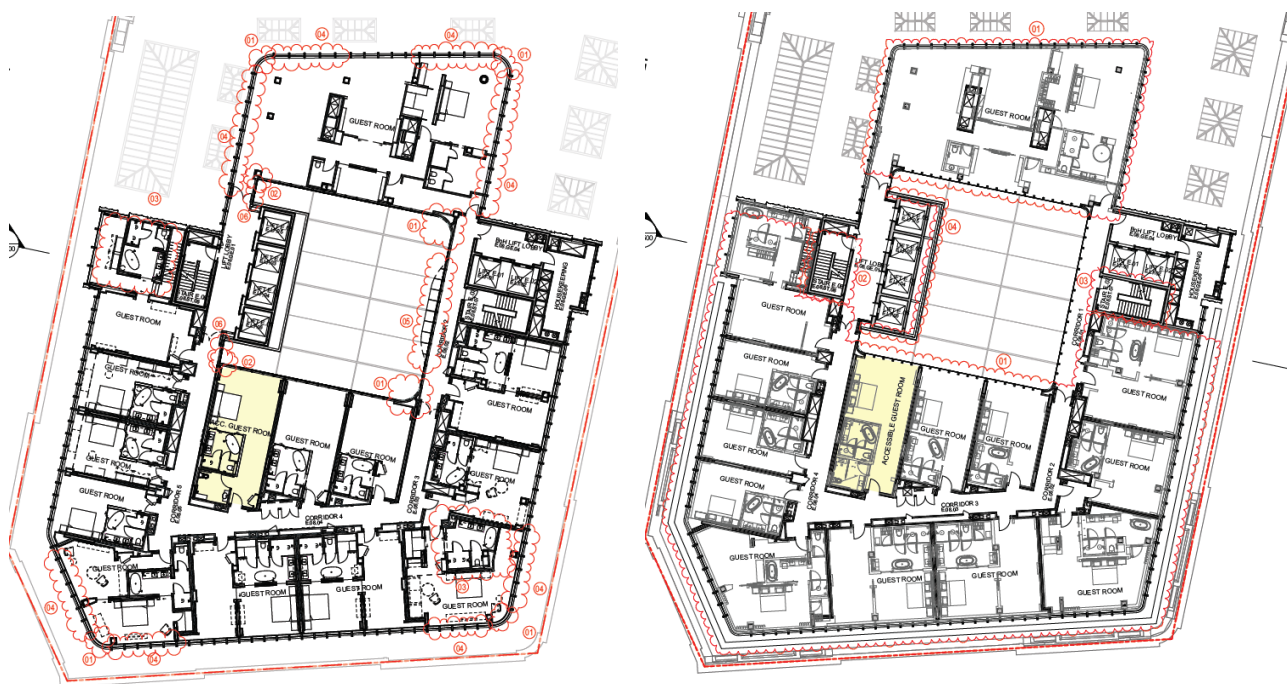


Figure 2 The proposed Mod 10 changes on Level 8 (left) for the external façade and internal courtyard changes, and the approved Mod 7 design (right)

Source: Webber



Figure 3 Bent Street photomontage of the proposed Mod 10 changes to the glass radius

Source: Webber



Figure 4 Bridge Street photomontage of the proposed Mod 10 changes to the glass radius and cladding

Source: Webber

2.1 Modifications to conditions

The proposed modifications described above and further detailed within **Attachment A** 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***.

2.1.1 Development Description

The modified description of the development is summarised as follows:

Stage 2 development consent for the adaptive reuse of the Sandstone Precinct for tourist and visitor accommodation, including:

- demolition of existing improvements and alterations to the Lands and Education Buildings
- maximum gross floor area of 28,977m², with 10,465m² in the Lands Building and ~~18,512m²~~ ***18,510m²*** in the Education Building
- maximum of 192 hotel rooms in the Education Building
- fit out of ancillary guest and visitor facilities
- construction of a roof extension to the Education Building, with a maximum height of RL 60.03
- excavation and construction of three basement levels and a subterranean link beneath Loftus Street, provision of loading bay facilities and 60 bicycle parking spaces

Justification

The amendments to the development description is to reflect the minor GFA change proposed as part of this modification application.

2.1.2 Condition A3 – Terms of Consent

A3 The Applicant, in acting on this consent, must carry out the development:

- a) in compliance with the conditions of this consent
- b) in accordance with all written directions of the Secretary
- c) generally in accordance with the State significant development application SSD 7484 Environmental Impact Statement prepared by JBA Urban Planning Consultants Pty Ltd, dated November 2016
- d) generally in accordance with the State significant development application SSD 7 484 Response to Submissions report prepared by JBA Urban Planning Consultants Pty Ltd, dated April 2017
- e) generally in accordance with the State significant development application SSD 7484 Response to Request for Further Information prepared by Ethos Urban, dated 6 December 2017
- f) generally in accordance with the following modification applications:
 - i) the Section 4.55(1) modification application (SSD 7484 Mod 1) prepared by Ethos Urban Planning Consultants dated 26 and 30 April 2018
 - ii) the Section 4.55(1A) modification application (SSD 7484 Mod 2) prepared by Ethos Urban Planning Consultants dated 6 August 2018
 - iii) the Section 4.55(2) modification application (SSD 7484 Mod 3) prepared by Ethos Urban Planning Consultants dated 16 October 2018
 - iv) the Section 4.55(1A) modification application (SSD 7484 Mod 5) prepared by Ethos Urban Planning Consultants dated 6 June 2019
 - v) the Section 4.55(2) modification application (SSD 7484 Mod 4) dated 26 June 2019, Response to Submissions dated 25 October 2019, Additional Information dated 21 November 2019, all prepared by Ethos Urban
 - vi) Section 4.55(1A) Modification Application (SSD 7484 MOD 6) dated 2 December 2019 and Response to Submissions dated 26 February 2020 both prepared by Ethos Urban
 - vii) the Section 4.55(2) Modification Application (SSD 7484 Mod 7) dated 28 January 2020 and Response to Submissions dated 6 May 2020, prepared by Ethos Urban

viii) the Section 4.55(1A) modification application (SSD 7484 Mod 8) prepared by Ethos Urban Planning Consultants dated 11 March 2020

ix) the Section 4.55(1A) modification application (SSD 7484 Mod 10 prepared by Ethos Urban dated 10 August 2020

g) generally in accordance with the endorsed conservation management plans, prepared by GBA Heritage dated May 2017 and endorsed by the Heritage Council NSW, June 2017

h) remediation in accordance with the Preliminary Remediation Action Plan prepared by Environmental Earth Sciences, dated 14 December 2017 (if required)

i) in accordance with the following drawings:

Architectural Drawings prepared by Make and Webber and HASSELL Architects			
Drawing No.	Rev.	Name of Plan	Date
SP-DA-G-2496	08 10	Proposed Plans - Education Building – Basement Level 03	10.12.19 20.07.20
SP-DA-G-2947	06 08	Proposed Plans - Education Building – Basement Level 02	10.12.19 20.07.20
SP-DA-G-2498	05 07	Proposed Plans - Lands Building – Lower Ground, Education Building – Basement Level 01	05.12.19 20.07.20
SP-DA-G-2498-M	00	Proposed Plans Lands Building - Lower Ground Mezzanine, Education Building - Basement Level 01	08.05.19
SP-DA-G-2499	10 12	Proposed Plans - Lands Building – Ground, Education Building – Lower Ground	10.12.19 20.07.20
SP-DA-G-2500	10 12	Proposed Plans - Lands Building – Level 01, Education Building – Ground	10.12.19 20.07.20
SP-DA-G-2501	07 09	Proposed Plans - Lands Building – Level 02, Education Building – Level 01	05.12.19 20.07.20
SP-DA-G-2502	08 10	Proposed Plans - Lands Building – Level 03, Education Building – Level 02	10.12.19 20.07.20
SP-DA-G-2503	07 09	Proposed Plans - Lands Building – Level 04, Education Building – Level 03	05.12.19 20.07.20
SP-DA-G-2504	07 09	Proposed Plans - Lands Building – Level 05, Education Building – Level 04	05.12.19 20.07.20
SP-DA-G-2505	09 11	Proposed Plans - Lands Building – Level 06, Education Building – Level 05	10.12.19 20.07.20
SP-DA-G-2506	09 11	Proposed Plans Lands Building – Level 07, Education Building – Level 06	02.05.20 20.07.20
SP-DA-G-2507	07 09	Proposed Plans - Lands Building – Level 08, Education Building – Level 07	05.12.19 20.07.20
SP-DA-G-2508	07 09	Proposed Plans - Lands Building – Level 09, Education Building – Level 08	05.12.19 20.07.20
SP-DA-G-2509	07 09	Proposed Plans - Lands Building – Level 10, Education Building – Level 09	05.12.19 20.07.20
SP-DA-G-2510	06 08	Proposed Plans - Lands Building – Level 11, Education Building – Roof	05.12.19 20.07.20
SP-DA-G-2511	04	Proposed Plans Lands Building – Level 12, Education Building – Roof	08.05.19
SP-DA-G-2512	04	Proposed Plans Lands Building – Roof, Education Building – Roof	08.05.19
SP-DA-G-3200	09 11	Proposed Elevations - Lands Building – South, Education Building – South	29.04.20 20.07.20
SP-DA-G-3201	06	Proposed Elevations Lands Building – West	08.05.19

Architectural Drawings prepared by Make and Webber and HASSELL Architects			
SP-DA-G-3202	08 10	Proposed Elevations - Lands Building – North, Education Building – North	05.12.19 20.07.20
SP-DA-G-3203	08 10	Proposed Elevations - Education Building – East	05.12.19 20.07.20
SP-DA-G-3204	06	Proposed Elevations Lands Building – East	08.05.19
SP-DA-G-3205	09 12	Proposed Elevations - Education Building – West	10.12.19 23.07.20
SP-DA-G-3210	07 09	Proposed Elevations - Education Building – Courtyard	05.12.19 20.07.20
SP-DA-G-3250	00	Proposed Courtyard Elevations, Lands Building – North Courtyard	08.05.19
SP-DA-G-3251	00	Proposed Courtyard Elevations, Lands Building – South Courtyard	08.05.19
SP-DA-G-3500	07 09	Proposed Sections - Lands and Education Building – Section 01	05.12.19 20.07.20
SP-DA-G-3501	03	Proposed Sections Lands Building – Section 02	08.05.19
SP-DA-G-3502	07 09	Proposed Sections –Education Building – Section 03	05.12.19 20.07.20
SP-DA-G-4100	02 05	Façade Details Education Building – Glass Bay	28.09.18 20.07.20
SP-DA-G-4101	00	Façade Details Education Building – Glass Bay Corner	17.10.16
SP-DA-G-4102	05 07	Façade Details - Education Building –Garden Villa	29.04.20 20.07.20
SP-DA-G-4103	06	Façade Details - Education Building – West Tower	10.12.19
SP-DA-G-4104	04 06	Façade Details - Education Building – Level 9 Infill Cladding	29.04.20 20.07.20
SP-DA-G-4105	02 05	Façade Details - Education Building – Cooling Towers	10.12.19 23.07.20
SP-DA-G-6000	11 13	Materials and Finishes Schedule	29.04.20 20.07.20

Justification

The amendments to plans are to reflect those changes proposed as part of this modification application. It must be noted that while some plans do not include any design changes, revisions have been amended to reflect changes on other plans, for consistency. Plan 4101 has also been combined with 4100 and is to be removed.

2.1.3 Condition F7 – GFA and Height Certification

A Registered Surveyor is to certify that:

- the development does not exceed the approved gross floor areas of the:
 - Education Building (~~18,512m²~~ **18,510m²** GFA)
 - Lands Building (10,465m² GFA)
- the development (excluding satellite dishes and balustrades) does not exceed the approved extension heights of the:
 - Education Building (RL 60.03)
 - Lands Building (RL 38.00).

Details shall be provided to the PCA demonstrating compliance with this condition prior to the issue of the final Occupation Certificate.

Justification

This condition is required to be amended to reflect the new GFA of the buildings.

2.1.4 Condition F24 – Numbering

Prior to the final Occupation Certificate being issued, street numbers and the building name must be clearly displayed ~~at either end of the ground level frontage~~ in accordance with ~~a signage strategy approved by the City of Sydney the Policy on Numbering of Premises within the City of Sydney~~. If new street numbers or a change to street numbers is required, a separate application must be made to the relevant authority.

Justification

This condition is proposed to be amended due to an inconsistency within the condition which refers to a repealed City of Sydney Policy, which requires different location of street numbers and building names than the condition specifies. It is proposed to amend the condition to ensure that street numbers and building name signage is provided in accordance with a signage strategy approved by the City of Sydney.

3.0 Substantially the same development

Section 4.55(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 in our opinion considered to meet the substantially the same development tests under Section 4.55(1A) of the EP&A Act as:

- the proposed modifications do not significantly alter the key components of the approved development description;
- the essence of the approved development remains unaffected, the development (as modified) remains true to the adaptive reuse of these exceptional state significant heritage buildings for tourist and visitor accommodation purposes;
- there is no increase to the maximum building height and the overall external visual appearance of the building remains largely consistent with that previously approved;
- has minimal impact to the heritage values of the Sandstone Precinct;
- has minimal impact to the external façade of the Sandstone Precinct outside those assessed as part of the original application;
- the internal courtyard changes are minor in nature and respond to further design development, and do not modify the overarching architectural style of the courtyard;
- the modified development has been closely reviewed by the project Design Review Panel, who overall support the changes and design development changes for the Education Building; and
- the environmental impacts of the modified development remain consistent with the approved development.

For these reasons, the DPIE can be satisfied that the modified proposal is substantially the same development for which consent was originally granted. Furthermore, it is important to note that the extent of the proposed modifications are generally minor in nature and are considered to have only minimal environmental impact beyond those considered during the assessment of SSD 7484 and the more recent approved plans.

4.0 Environmental assessment

Section 4.55(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 4.55(3) the consent Authority must also take into consideration the relevant matters to the application referred to in section 4.15(1) of the EP&A Act and the reasons given by the consent authority for the grant of the original consent.

The following assessment considers the relevant matters under section 4.15(1) and demonstrates that the development, as proposed to be modified, will be of minimal environmental impact.

4.1 Statutory and Strategic Context

The Environmental Impact Statement submitted with the original State Significant Development application addressed the proposed development’s level of compliance against the relevant strategic plans, policies, guidelines and statutory planning instruments, including:

- *Environmental Planning and Assessment Act 1979*;
- *Environmental Planning and Assessment Regulation 2009*;
- State Environmental Planning Policy (State and Regional Development) 2011;
- State Environmental Planning Policy (Infrastructure) 2007;
- State Environmental Planning Policy 55 (Remediation of Land);
- Sydney Regional Environmental Plan (Sydney Harbour Catchment) 2005;
- A Plan for Growing Sydney;
- Sydney 2030 (City of Sydney);
- Development Near Rail Corridors and Busy Roads: Interim Guideline;
- Guide to Traffic Generating Developments;
- NSW Planning Guidelines for Walking and Cycling;
- NSW Long Term Master Plan;
- Sydney Local Environmental Plan 2012; and
- Sydney Development Control Plan 2012.

The proposed modifications do not affect the development’s level of compliance with the majority of the relevant planning instruments and strategic documents.

4.2 Reasons given for granting consent

During the assessment of the Stage 2 SSD 7484, the DPE (now DPIE) considered a number of key issues including:

- design quality;
- traffic, parking and servicing;
- the Voluntary Planning Agreement;
- construction impacts;
- archaeology; and
- heritage.

The DPE was satisfied that these issues could be appropriately dealt with and considered that the impacts of these key items could be managed and mitigated accordingly. Furthermore, the adaptive re-use of the Sandstone Precinct buildings was considered to activate and add further vitality to the northern end of the CBD, with the project considered to sensitively respond to the heritage significance of the broader precinct. The DPE concluded the proposal was in the public interest and recommended the application for approval.

4.3 Consistency with Stage 1 consent

The Stage 1 approval granted consent under the Stage 1 SSD 6751 establishes the vision and planning framework to assess the detailed design of the future development on the site. In accordance with Section 4.24(1A) of the EP&A Act, while this Stage 1 DA remains in force development on the site cannot be inconsistent with the approved Concept Proposal/Stage 1 DA.

The original Stage 2 SSD 7484 was assessed in terms of consistency with the Stage 1 consent and found to be entirely consistent. The proposed development as proposed to be modified remains consistent with the Terms of Approval as set out in the SSD 6751 consent for the Stage 1 SSD. The modifications as part of this S4.55 application do not change the overall development's consistency with the approved Stage 1 SSD and do not trigger a need to amend the Stage 1 consent.

The Stage 1 approval was very broad in nature and did not include any limiting parameters to achieving the adaptive re-use of the buildings for tourist and visitor accommodation.

4.4 Heritage

A Heritage Impact Statement addendum has been prepared by Urbis and is included at **Attachment C**. Urbis has played a key role in assisting Make with the amended design for the Education Building, focusing on ensuring adverse heritage impacts are minimised while providing reasonable amenity as the building is converted to hotel use. In particular, the proposed modifications are considered to have a relatively minor impact and are in accordance with the endorsed conservation policies. The changes are considered to not have an impact on heritage fabric.

The proposed modifications are considered to have an acceptable impact on the Education Building given the context of the major adaptive reuse works approved by the original SSD 7484 to permit the redevelopment of the site for tourist and visitor accommodation.

The proposed change to Condition F24 will ensure that heritage considerations are appropriately addressed through the signage strategy process.

4.5 Built Form

The proposed modifications to the Education Building generally retain the key parameters of the approved building envelope, noting the change to the proposed rooftop extension in terms of corner radii, mullion adjustments and material amendments (the latter restricted to Level 9). These are not, however, substantially noticeable from the street. Overall, the proposed modification results in a consistent outcome for the Education Building, maintaining its importance and heritage values while ensuring that the design is of a high-quality.

Visual Impact

The proposed modifications to the Education Building will continue to ensure the building reads per the current approval, with the façade changes proposed not resulting in significant changes to the external views of the building outside of the approved roof extension.

The proposed material change on the Level 9 northern elevation from perforated cladding to solid fluting cladding ensures that the changes do not dominate the existing heritage values of the precinct and benefits the built form appearance through ensuring consistency with the existing building. Refer to **Figures 5 and 6** for a comparison photomontage of the view from Bridge Street, showing the Level 9 changes.

The proposed refined design for the building ensures the design is generally consistent with the appearance of the existing sandstone building and the approved roof extension. Importantly, the proposed external façade changes, inclusive of the radii changes to corners and mullion changes across Levels 6 through 9 will not result in any significant visual change from the public domain from the existing situation (as also illustrated within **Figures 7 and 8**).



Figure 5 **Approved Mod 7 Bridge Street photomontage**



Figure 6 **Proposed Mod 10 Bridge Street photomontage**



Figure 7 **Approved Mod 7 Bent Street photomontage**



Figure 8 **Proposed Mod 10 Bent Street photomontage**

Design Excellence

The proposed changes to the Education Building continue to exhibit design excellence as identified by the Department in the original assessment report for SSD 7484. The Design Review Panel has been consulted on the proposed changes and will continue to be consulted through design development ensuring design excellence will be achieved. Refer to the DRP Advice at **Attachment E**.

Specifically, Make as the architects for the Education Building are experienced and highly capable when it comes to design excellence and exhibit clear understanding of the requirements for the site to ensure it responds to its surrounds and the heritage context.

4.5.1 Gross Floor Area

The existing approved Stage 2 consent provides for a total gross floor area (GFA) of 28,977m², comprised of:

- 10,465m² within the Lands Building; and
- 18,512m² within the Education Building.

The proposed amendments to the design result in a small decrease of 2m² in GFA across the site, due to the increase in the corner radii on Levels 6 through 9 and construction on-site increasing the thickness of outside walls. **Table 4** outlines the minor change in GFA resulting from the proposed modification.

The modification to the numerical GFA for the precinct is not the result of any increase to the bulk, mass or scale of the development. Furthermore, it does not give rise to an intensification of, or any additional environmental impacts and in fact results in a minute decrease in floor area across the site.

Table 2 Gross floor area amendments

Site	Approved GFA (m ²)	Proposed GFA (m ²)	Difference	Percentage
Lands Building	10,465	10,465	0	0%
Education Building	18,512	18,510	-2	-0.01%
Total	28,977	28,975	-2	-0.006%

4.6 Construction Management

The existing conditions of consent that apply continue to provide the appropriate framework for the management of the proposed design modifications.

5.0 Conclusion

The proposed modifications to the Education Building are primarily the result of on-site design development and also manufacturing challenges associated with previously proposed material specifications.

The modified development remains consistent with the approved Stage 1 SSD consent and relevant statutory and strategic plans and policies that apply to the site.

In accordance with section 4.55(1A) of the EP&A Act, the DPE 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.

We trust that this information is sufficient to enable a prompt assessment of the proposed modification request.

Yours sincerely,



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