



CHASE DM

# Section 4.55 (2) Modification Report

DA 210293, Staged 18 Lot Residential Subdivision  
Including Upgrade of Guise Street/Majura Lane,  
Construction of New Road and Creation of  
Bypass Corridor.

Project: 2155 Sutton Road, Sutton (Lot 1 in DP  
32236)

Client: RSF Pty Ltd

July | 2025

Document Information

*Client:* RSF Pty Ltd

*Project:* 2155 Sutton Road, Sutton (Lot 1 in DP 32236)

*Date:* 29 June 2025

*Location:* 2155 Sutton Road, Sutton (Lot 1 in DP 32236)

*Job Number* 2025003

Document History

Revision	Description	Date
A	Draft – For preliminary comment	09/04/2025
B	Final – For Submission	04/07/2025

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- 2. Subdivision Design by Chase DM
- 3. Bushfire Report by AEP
- 4. Flora and Fauna Report by Ecological Australia
- 5. Flooding Review by Chase DM
- 6. Aboriginal Archaeological Reports by Past Traces
- 7. Land Capability Report by Soil & Water

# 1.0 Introduction

## 1.1 Background

Sydney-based developer RSF Pty Ltd has reached commercial terms relating to the sale of part of 2155 Sutton Road, Sutton (Lot 1 in DP 32236) currently owned by long-term resident Mr Phillip Keir. The current property comprises c.73 hectares, was created in 1960, and is largely undeveloped being used for cattle and horse agistment. There is an existing dwelling to the south, stables and other outbuildings. A small ephemeral tributary of McLaughlin's Creek bisects the property (see **Figure 1-1**).



**Figure 1-1 Aerial photo of the Subject Site Showing Existing Improvements (Source: PHL)**

The subject site is located to the south of village of Sutton, about 17 kilometres south of Gundaroo, near the Federal Highway, on the northern outskirts of Canberra. It is bordered to the north by Guise Street/Majura Lane and the village of Sutton, to the east by Sutton Road and beyond to the new Woodbury Estate development, to the south by farmland fronting the Federal Highway and the west by a Crown Road and beyond to farmland (see **Figure 1-2**).

The northern part of the site has been the subject of a rezoning for residential purposes and a relatively recent Development Application (DA) 210293 issued by Yass Valley Council on 23 March 2023 for subdivision into 18 residential lots. RSF has an interest in this part 'the R2 residential part of the property as well as triangular shaped part of land north of the proposed Sutton Bypass.

Due diligence has found that the current structure of the DA prohibits the separation of the R2 land until all the subdivision works are complete, and the individual lots registered. The DA also does not permit the separation of the land north of the proposed Sutton Bypass as this remains part of the residue lot. The current consent does not discuss subdivision of the R2 development component from the parent lot, which will be required to facilitate transfer of the land.





Figure 1-2 – Site Plan 2155 Sutton Road, Sutton (Source: NSW Planning Portal)

Due diligence has also found that the subdivision of the 17 residential lots can be slightly adjusted to produce 2 extra lots through a minor reconfiguration. The additional yield is achieved by shortening up the main cul-de-sac and by averaging the developable land evenly across all the lots within the R2 zoned section and yet still comply with the 5,000m<sup>2</sup> minimum lot size (MLS) provision. Importantly, this reconfiguration does not impact any additional land which was not considered as part of the original proposal.

Preliminary discussions with Yass Valley Council have confirmed that the proposed modifications are 'substantially the same development' and Council would accept a modification pursuant to s.4.55(2) of the Environmental Planning and Assessment Act (EPAA) provided all matters were adequately addressed in a modification report.

## 1.2 Purpose of this S.4.55(2) Modification Report

RSF Pty Ltd has now engaged Chase DM Pty Ltd to prepare this modification report to be lodged with Council. The purpose of this report is to:

- Identify and describe the proposed changes;
- Include both the originally approved and amended plans, with modifications clearly marked or annotated;
- Demonstrate that the development remains substantially the same as the original consent;
- Address how the proposed changes satisfy the relevant provisions of Section 4.55 of the Environmental Planning and Assessment Act 1979;
- Demonstrate consistency with applicable council planning controls and policies;
- Confirm alignment with any previously approved modifications, where relevant.

This report makes use of the existing documents prepared by PHL Surveys Pty Ltd and the various consulting reports that supported the original DA not limited to:

- Detailed survey/subdivision plan by PHL

- Bushfire Report by Ember
- Flora and Fauna Report by Ecological Australia
- Flooding Report by Lyall and Associates
- Aboriginal Archaeological Reports by Past Traces
- Land Capability Report by Soil & Water

### 1.3 Engagement with Yass Valley Council

As noted above, a preliminary meeting was held with representatives of Yass Valley Council on Wednesday 19<sup>th</sup> March, to seek advice on:

- Existing development site i.e., R2 zoned section into a separate 'super lot'
- Modifications to the 17 lots, esp. staging and changes to the lots and central road
- Treatment to Majura Lane
- The Sutton Bypass Road (position, alignment, width, separate lot, acquisition)
- Subdivision of the residue into two lots – i.e. split by the bypass and

The nature of the proposed modifications were discussed with Council on the basis that proposed development will remain largely unchanged in terms of land use, access off Majura Lane/Guise Street, lot size, services, fencing and landscaping, infrastructure, developable land, strategic planning (i.e., compliance with the Sutton Masterplan), environmental assessment and site constraints (i.e., bushfire, effluent disposal, flooding, riparian and visibility).

Council identified that their review of the merits of the modification would relate primarily to the statutory compliance of the proposal, with consideration to be given to bushfire protections and the consistency with previous findings of the current DA. The development team asked what provisions should be made within the proposed plan amendments to provide sufficient space for the future Sutton Bypass. Council noted that they would confirm their requirements prior to finalisation but did not consider the bypass to be a current priority. Council also advised that the 12m radius turning head for cul-de-sac design and a 25m wide road reserve should be maintained in any redesign.

The current growth provisions within the Settlement Strategy were also discussed, noting that 137 of the 150 lots proposed for Sutton within the strategy have already been approved. The additional two lots proposed by the modification do not contravene this Strategy.

Council accepted 'in principle' that the development was 'substantially the same development' insofar as modification pursuant to s.4.55(2) of EP&A Act (1979) is concerned. To avoid any confusion, it was considered preferable to have all the modifications 'wrapped up' in the one application to avoid multiple rounds of community consultation.

### 1.4 Supporting Documentation

The supporting documents in the table below have been uploaded as separate documents to the NSW Planning Portal in support of this Modification Report.

**Table 1.0 – Supporting Documents to be loaded to the NSW Planning Portal**

Document	Author	Date
<b>Modification Report</b>	Chase DM	04/07/25
<b>Draft Deposited Plan</b>	Snowy Surveyors	26/06/25
<b>Subdivision Design</b>	Chase DM	04/07/25
<b>Bushfire Report</b>	AEP	03/07/25
<b>Flora and Fauna Report</b>	Ecological Australia	07/07/25
<b>Flooding Review</b>	Chase DM	04/07/25
<b>Aboriginal Archaeological Reports</b>	Past Traces	28/05/25
<b>Land Capability Report</b>	Soil & Water	04/06/25

## 2.0 Site and Context

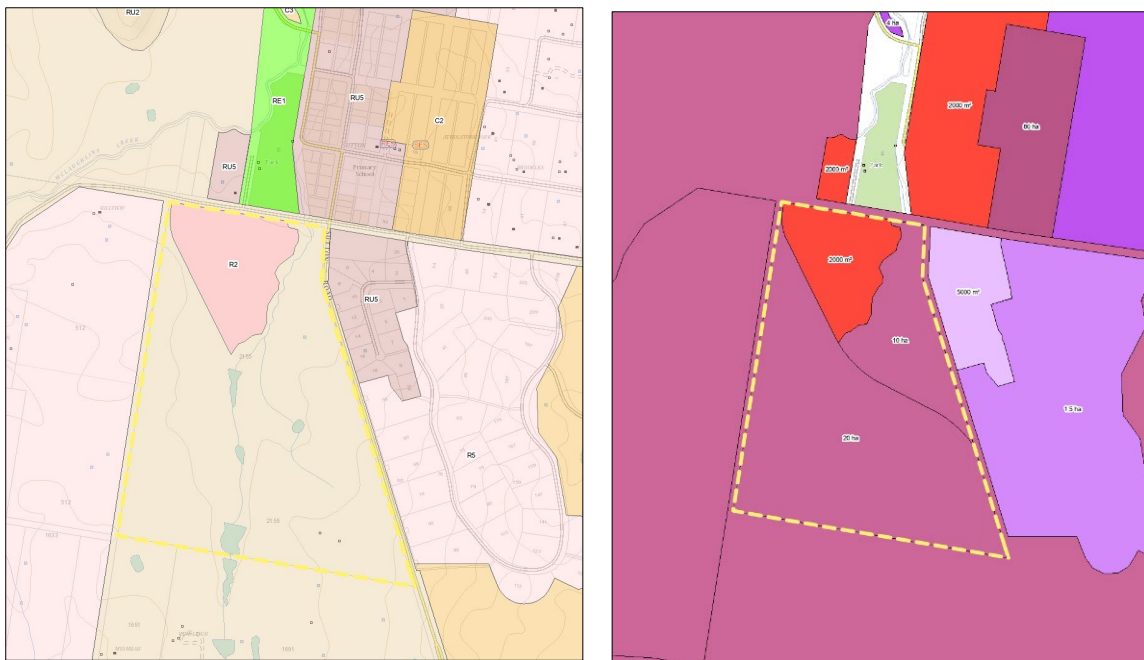
### 2.1 Current Planning Controls

*“The subject land, Lot 1 DP32236, is a parcel of land of 73 hectares created in 1960 and largely undeveloped being used for cattle and horse agistment. The land is bounded to the north by Guise Street / Majura Lane and to the east by Sutton Road, the main southern entrance road to the Village of Sutton.*

*The landowner lodged a Planning Proposal in July 2018 seeking an amendment to the Yass Valley LEP 2013 to enable residential development on the site consistent with the Sutton Masterplan 2017. Council endorsed this proposal in August 2108 with a minimum lot size for residential development of 5,000m<sup>2</sup>, where gravity sewerage was not available.*

*The Planning Proposal was amended following the submissions received from the State agencies and public organisations and at the Council meeting of 26 August 2020 it was resolved that the Planning Proposal be adopted and DPIE be requested to make the amendment to Yass Valley LEP 2013 as a local plan-making authority. This amendment came into effect on the 6<sup>th</sup> of November 2020 as Amendment no. 11 to the YVLEP2013.” (source: Coe Planning Services, n.d.).*

The current zoning and minimum lot size under Yass Valley Local Environmental Plan 2013 are shown in **Figure 2 – 1**. As noted above, the proposed modification keeps strictly within R2 zoned section of the site and the 5,000m<sup>2</sup> and 10ha and 20 ha minimum lot size extent.



**Figure 2 - 1 – Current Zoning and Minimum Lot Size (Source: NSW Planning Portal)**



Current planning controls for the site are listed in **Table 2** below.

**Table 2 - Current Planning Controls for the Site**

Planning Control	Affection
Local Environmental Plans	Yass Valley Local Environmental Plan 2013 (pub. 17-7-2020)
Land Zoning	R2 - Low Density Residential: (pub. 24-2-2023) RU1 - Primary Production: (pub. 20-10-2023)
Height Of Building	NA
Floor Space Ratio	NA
Minimum Lot Size	10 ha 20 ha 2000 m <sup>2</sup>
Heritage	NA
Land Reservation Acquisition	NA
Foreshore Building Line	NA
Groundwater Vulnerability	Groundwater Vulnerability
Salinity Dryland	Salinity
Terrestrial Biodiversity	Biodiversity
1.5 m Buffer around Classified Roads	Classified Road Adjacent
Bushfire Prone Land	Vegetation Category
Land near Electrical Infrastructure	This property may be located near electrical infrastructure and could be subject to requirements listed under Transport and Infrastructure SEPP 2021 Clause 2.48. Please contact Essential Energy for more information.
Local Aboriginal Land Council	NGAMBRI
Regional Plan Boundary	Southeast and Tablelands

Source: NSW Planning Portal

The property is affected by several State Environmental Planning Policies (SEPPs) such as

- SEPP (Biodiversity and Conservation) 2021: Excluded (pub. 21-10-2022)
- SEPP (Biodiversity and Conservation) 2021: Land Application (pub. 2-12-2021)
- SEPP (Exempt and Complying Development Codes) 2008: Land Application (pub. 12-12-2008)
- SEPP (Housing) 2021: Land Application (pub. 26-11-2021)
- SEPP (Industry and Employment) 2021: Land Application (pub. 2-12-2021)
- SEPP (Planning Systems) 2021: Land Application (pub. 2-12-2021)
- SEPP (Primary Production) 2021: Land Application (pub. 2-12-2021)
- SEPP (Resilience and Hazards) 2021: Land Application (pub. 2-12-2021)
- SEPP (Resources and Energy) 2021: Land Application (pub. 2-12-2021)
- SEPP (Sustainable Buildings) 2022: Land Application (pub. 2-12-2022)
- SEPP (Transport and Infrastructure) 2021: Land Application (pub. 2-12-2021)


None of the above controls have changed substantially since the original DA was approved in 2023.

We understand that Yass Valley Council is soon to commence work on their updated Settlement Strategy. The Revised Southeast Tablelands Regional Plan remains in Draft form.

## 3.0 Current DA and Proposed Modification

### 3.1 Current DA210293

On 23 March 2023, Yass Valley Council issued development consent DA210293 for the following:



YASS VALLEY COUNCIL  
the country the people

**DEVELOPMENT APPLICATION**

**NOTICE OF DETERMINATION – APPROVAL**  
*Issued under Section 4.18(1)(a) Environmental Planning and Assessment Act 1979*

<b>Development Consent:</b>	DA210293
<b>Applicant:</b>	Mr P Keir c/- PHL Surveyors Pty Ltd
<b>Applicant Address:</b>	3 Gibraltar Street BUNGENDORE NSW 2621
<b>Development Site:</b>	Lot 1 DP 32236 2155 Sutton Road, Sutton NSW 2620
<b>Proposed Development:</b>	Staged 18 lot residential subdivision including Upgrade of Guise Street/Majura Lane, construction of a new road and creation of a bypass corridor in the following manner:  <b>Stage 1</b> Creation of Lots 1 - 4 + Residue Lot + Creation of Future Bypass Road Corridor + Upgrade of Guise Street  <b>Stage 2</b> Creation of Lots 5 - 8 + Residue Lot + Upgrade of Majura Lane + Construction of new Road  <b>Stage 3</b> Creation of Lots 9-17 + Creation of Right of Way
<b>Proposed Use:</b>	Not Applicable
<b>Determination:</b>	The application is approved subject to the attached conditions of consent.
<b>Other Approvals:</b>	General terms of approval/concurrence issued by the following state agencies have been included in this consent:  (a) NSW Department of Planning & Environment - Water (refer Appendix A) (b) NSW Rural Fire Service (refer Appendix B) (c) Transport for NSW (refer Appendix C) (d) NSW Department of Planning and Environment – Crown Lands (refer Appendix D) (e) TransGrid (refer Appendix E) (f) NSW State Emergency Services (NSW SES) (refer Appendix E)
<b>Other Approvals:</b>	This consent authorises work under <a href="#">s.138 Roads Act 1993</a>
<b>Date of Determination:</b>	23 March 2023

The stamped plans (see **Figure 3-1** and **Figure 3-2** below) provide for 17 large residential lots ranging in size from 5,000m<sup>2</sup> to 8,270m<sup>2</sup> located on the R2 zoned land west of the creek line and a 62ha residual lot over the RU1 zoned land. The lots are well-shaped and provide good building sites and with adequate sewage disposal areas. Vehicular access to these lots will be via a new road from Majura Lane/Guise Street.

The approved road reserve is 25m wide, and 400m long. Lots 1 – 7 will front Majura Lane/Guise Street, whereas Lots 8 to 17 will have property access via the new internal public road. The residual rural land will utilise the existing access into the property. The internal wide road reserve will allow ample room for pedestrian and cycling movement (source: Coe Planning Services, n.d.).

The consent is broken down into 3 stages as follows:

- Stage 1 – Creation of lots 1 – 4 + residue lot + Creation of future bypass corridor + Upgrade of Guise Street
- Stage 2 - Creation of lots 5 – 8 + residue lot + Upgrade of Majura Lane + Construction of new road
- Stage 3 – Creation of Lots 9 – 17 + Creation of right of way.

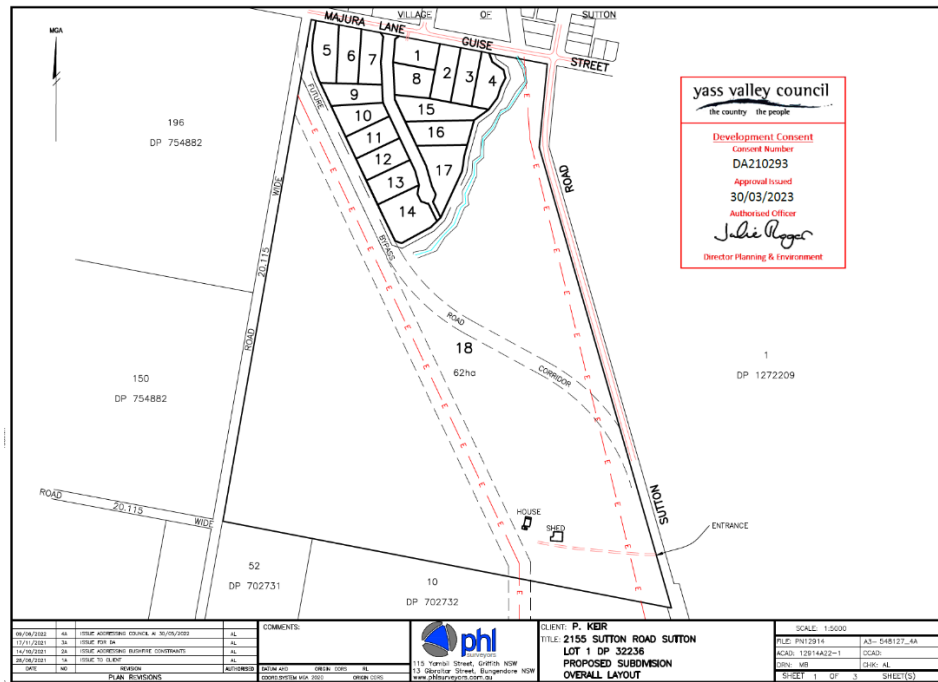


Figure 3-1 - DA210293 Stamped Plans (Overall Development)

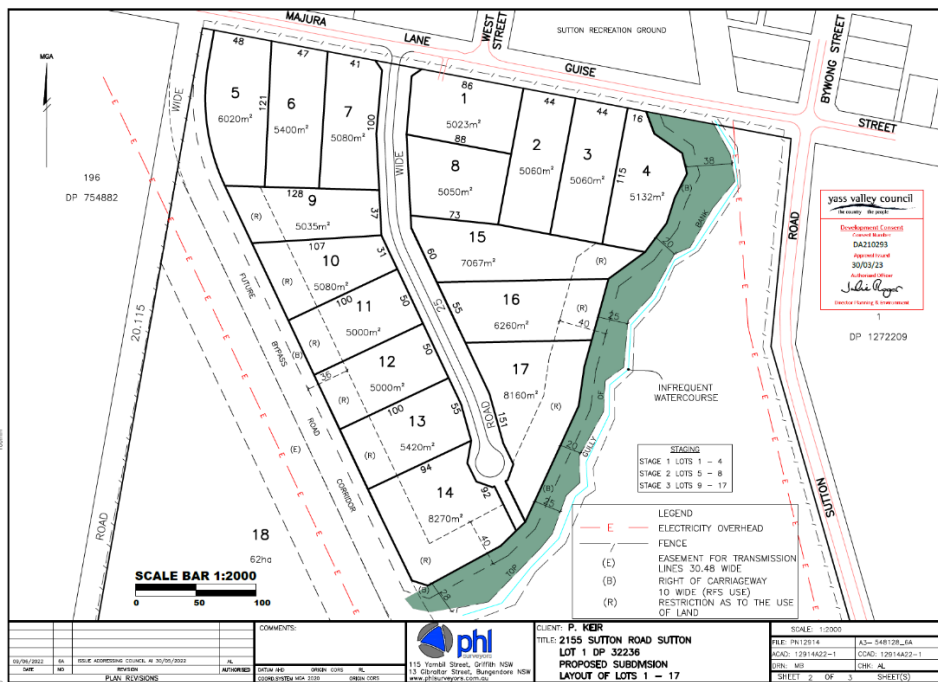


Figure 3-2 - DA210293 Stamped Plans (Detail on R2 Residential Lots)

The consent was supported by a range of State Agencies including NSW Department of Planning and Environment (DPE), NSW Water, Rural Fire Services, Transport for NSW, Crown Land, Transgrid and NSW State Emergency Service.

Council imposed 121 conditions requiring, amongst other things:

- A Subdivision Works Certificate detailing compliance with Council Subdivision Standards
- A Controlled Activity Approval issued by NSW DPE – Water including a Riparian Management Plan
- A Construction Environmental Management Plan
- Upgrade of Guise Street and Majura Lane
- Landscaping to the new cul-de-sac
- Maintenance of an Asset Protection Zone and
- Payment of Developer Contributions and Long Service Leave Levy.

## 3.2 Proposed Modification

Three changes (modifications) are proposed (see Design Drawings **Figure 3-3** and **Figure 3-4** below) to the existing consent and approved drawings to advance the development as follows:

### *3.2.1 - Modification 1 – Super-lot Subdivision of R2 Zoned Land*

Whilst the approval envisages three distinct stages, the consent as written prohibits the separation of the R2 land i.e., the 17 proposed large residential lots until all the subdivision works are complete, and the individual lots registered. This makes it impossible for anyone other than the owner of the parent lot to undertake the development.

A simple solution is to introduce an initial stage, Stage 0 which separates all the R2 zoned land into a single super-lot via a 'paper' subdivision envisages no physical work, utilities or payment of developer contributions and the balance into a 'residual' lot retained by Mr Keir. This could be undertaken via a modification to the consent and a Subdivision Works Certificate for Stage 0. Being a 'paper' subdivision (i.e., with no physical work), this would be a simple administrative matter and could be promptly registered at the Land Registry Service.

### *3.2.2 - Modification 2 – Increase from 17 to 19 x R2 Zoned Lots by shortening the main cul-de-sac and by distributing the developable area over all lots*

A slight redesign of the 17 x R2 residential lots by redistributing the developable land more evenly across all the lots and shortening the main cul-de-sac can optimise the use of developable land to create 2 additional lots. These lots are strictly located within the R2 developable area and still comply with the 5,000m<sup>2</sup> minimum lot size provision. The overall footprint of the subdivision remains unchanged.

### *3.2.3 - Modification 3 – Subdivision of the c.62ha residual R1 land into 1 x c.13ha and 1 x c.48ha lots having their common boundary defined by Proposed Sutton Bypass*

The area located to the east of the R2 zoned section, bordered by Sutton Road to the east and the proposed Sutton Bypass to south has different minimum lot size to the residual parcel south of the Sutton Bypass. In discussions with YVC it was established that a new 13.17ha lot (proposed lot 20) in this location would comply with both the RU1 Zoning Provisions and MLS of 10ha and could gain access from Guise Street. Works to provide services to Lot 20 would be undertaken as part of the subdivision.

This modification would reduce the original residual lot (Lot 21) from 62ha to 48.41ha and so would still comply with the existing 40Ha minimum lot size. Lot 21 is proposed to retain its existing access and servicing from Sutton Road. The new Sutton Bypass would be then located on the common boundary of both lots in a 'restricted developable area' (wholly contained within proposed Lot 21) as opposed to being in the middle of a single lot thus better ensuring its delivery by Yass Calley Council in the future.

The Modification proposed the following stages:

- Stage 0 (see **Figure 3 – 3**) – Creation of two lot (super-lot) subdivision which separates all the R2 zoned land into one lot (proposed lot A c.11.78ha) and the residue into single lot (proposed Lot B c.62.0ha) with no physical work, utilities or payment of developer contributions.
- Stage 1 (see **Figure 3 – 4**) – Creation of lots 1 – 4 & 20 - 21 + Creation of future bypass corridor + Upgrade of Guise Street
- Stage 2 (see **Figure 3 – 4**) - Creation of lots 5 – 8 + residue lot + Upgrade of Majura Lane + Commencement of new road
- Stage 3 (see **Figure 3 – 5**) – Creation of Lots 9 – 19 + Creation of right of way + Completion of new road.

The land has recently been released to the market and, pending feedback and sales rates, the developer may opt to construct stages 1-3 simultaneously.

Preliminary discussions with Yass Valley Council have confirmed that they would prefer to deal with 3 modifications together and in totality they can still be regarded as being 'substantially the same development'.

The modification has required modifications and reviews of the following design drawings and reports which have been submitted as annexures to this report and discussed in the following section:

- Draft Deposited plan by Snowy Surveyors
- Subdivision Design by Chase DM
- Bushfire Report by AEP
- Flora and Fauna Report by Ecological Australia
- Flooding Review by Chase DM
- Aboriginal Archaeological Reports by Past Traces
- Land Capability Report by Soil & Water

These reports are provided as appendices to this report. All other aspects of DA210293 remain unchanged.

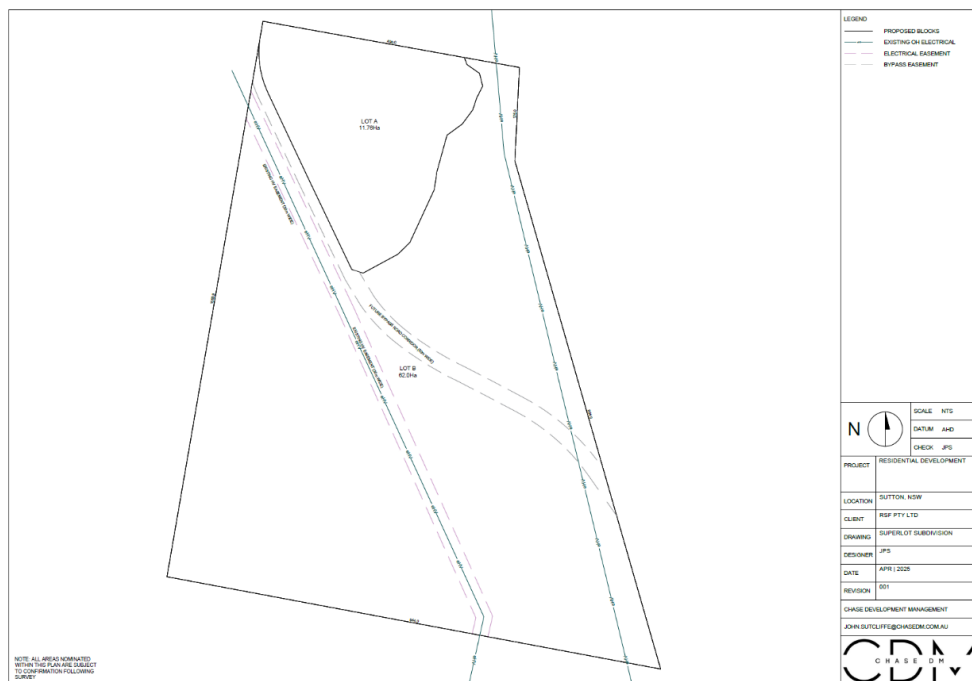


Figure 3-3 - DA210293 Proposed Modified Plans (Super lot Subdivision – Stage 0)





## 4.0 Statutory Assessment

### 4.1 - 4.55 Modifications

A 4.55 modification application provides a pathway to amend an existing development consent without the need to prepare and lodge a completely new DA. Modifications such as this can be useful for accommodating changes that emerge during detailed design, construction, or delivery—whether driven by practical constraints, client directions, or in this case commercial refinements.

There are three categories of Section 4.55 modifications, each designed to respond to a different scale and nature of change:

- **4.55(1) – Correction of Minor Errors** - This category is used to rectify minor, non-substantive errors in the development consent or accompanying documentation. Typical examples include typographical mistakes, clerical oversights, or minor numerical discrepancies. A 4.55(1) modification does not alter the design, intent, or impact of the approved development—it simply ensures that the consent accurately reflects what was intended and approved. It is a straightforward process aimed at maintaining clarity and consistency in the consent documentation.
- **4.55(1A) – Minimal Environmental Impact Changes** - A Section 4.55(1A) application applies to minor changes that do not substantially alter the nature of the approved development or result in any increased environmental impact. These are typically small-scale design refinements that remain consistent with the original intent of the consent. Common examples include relocating doors or windows, adjusting internal layouts, or making minor amendments to materials or finishes. While these changes are modest, they must still be carefully assessed to ensure they do not trigger the need for a more substantial modification or new approval. This pathway allows for flexibility during the construction or documentation phases while preserving the integrity of the original development consent.
- **4.55(2) – Other Modifications** - A Section 4.55(2) application applies to more substantial changes to an approved development that go beyond minor or incidental adjustments but still do not result in a fundamentally different development. This category may include more design changes, alterations to building layout, or functional modifications that respond to evolving project needs. While the development must remain “*substantially the same*” as originally approved, these applications require a more detailed assessment, clear planning justification, and—depending on the nature of the change—may involve notification to surrounding landowners or broader community consultation.

### 4.2 - 4.55(2) Modifications

The proposed modification would fall into the category of **4.55(2) – Other Modifications** given it is more substantial but still does not result in a fundamentally different development from that which was approved.

Section 4.55(2) provides 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 and subject to and in accordance with the regulations, modify the consent if:

- a) *it is satisfied that the development to which the consent as modified relates is substantially the same development as the development for which consent was originally granted and before that consent as originally granted was modified (if at all), and*

- b) *it has consulted with the relevant Minister, public authority or approval body (within the meaning of Division 4.8) in respect of a condition imposed as a requirement of a concurrence to the consent or in accordance with the general terms of an approval proposed to be granted by the approval body and that Minister, authority or body has not, within 21 days after being consulted, objected to the modification of that consent, and*
- c) *it has notified the application in accordance with the regulations, if the regulations so require, or a development control plan, if the consent authority is a council that has made a development control plan that requires the notification or advertising of applications for modification of a development consent, and*
- d) *it has considered any submissions made concerning the proposed modification within the period prescribed by the regulations or provided by the development control plan.*

An essential test in **4.55(2) – Other Modifications** is to what constitutes being ‘*substantially the same*’. In planning law, there is no simple answer as it depends on the circumstances of each case, but there are some guiding principles that can be drawn from the case law.

The requisite factual finding obviously requires a comparison between the development, as currently approved, and the development as proposed to be modified. The result of the comparison must be a finding that the modified development is “essentially or materially” the same as the (currently) approved development. It is the features or components of the originally approved and modified developments that are to be compared to assess whether the modified development is substantially the same as the originally approved development.

The comparative task involves a comparison of the physical features or components of the development as currently approved and modified in both a quantitative and qualitative manner including circumstances in which the development consent was granted.

### 4.3 Comparison of Original Development to Development as Modified

Following on from the statutory assessment above, **Table 4.1** compares the Original Development (DA210293) to the development as modified against various assessment criteria.

On this basis, Yass Valley Council can be satisfied that the development to which the consent as modified relates is ‘substantially the same’ development as that which consent was originally granted and before that consent as originally granted was modified (if at all).”

**Table 4.1 Comparison of Original Development (viz. DA210293) to Development as Modified**

Criteria	Original Development (viz. DA210293)	Development as Modified	Substantially the Same?
<b>Nature of change</b>			
<b>Land Use</b>	Large lot residential development + residual rural lot	Large lot residential development + smaller lifestyle lot + residual rural lot	✓
<b>Lot arrangement</b>	Lots 1 – 7 will front Majura Lane/Guise Street, whereas Lots 8 to 17 will have property access via the new public road. The residual rural land will utilise the existing access into the property.	Lots 1 – 7 will front Majura Lane/Guise Street, whereas Lots 8 to 19 will have property access via the new public road. The additional lifestyle lot will front Majura Lane/Guise Street whilst the residual rural lot will utilise the existing buildings and access into the property	✓
<b>Overall Yield</b>	17 x large lot residential lots + residue lot	19 x large lot residential lots + lifestyle lot + residue lot	✓
<b>Lot sizes</b>	17 x large lot residential lots ranging in size from 5,000m <sup>2</sup> to 8,270m <sup>2</sup> + 62ha residual rural lot	19 x large lot residential lots ranging in size from 5,000m <sup>2</sup> to 6,271m <sup>2</sup> + c.13.7ha lifestyle lot + c.48.41ha residual rural lot	✓
<b>Nett developable area</b>	Residential lots restricted to R2 zone and residual rural lot to R1 zone	Residential lots restricted to R2 zone and lifestyle lots + rural lot to R1 zone	✓
<b>External Roads</b>	Upgrade of Majura Lane/Guise Street to Council requirements	Upgrade of Majura Lane/Guise Street to Council requirements	✓
<b>Internal Road</b>	Construction of a new 400m long cul-de-sac 25m wide, 12m turning radius.	Construction of a new c.360m long cul-de-sac 25m wide, 12m turning radius.	✓
<b>Staging</b>	Stage 1 – creation of lots 1 – 4 + residue lot + Creation of future bypass corridor + upgrade of Guise Street Stage 2 - Creation of lots 5 – 8 + residue lot + upgrade of Majura Lane + construction of new road Stage 3 – Creation of Lots 9 – 17 + creation of right of way	Stage 0 – creation of two lot (super-lot) subdivision which separates all the R2 zoned land into one lot (proposed lot A c.11.78ha) and the residue into single lot (proposed Lot B c.62.0ha) with no physical work, utilities or payment of developer contributions Stage 1 – Creation of lots 1 – 4 + residue lot + creation of future bypass corridor + Upgrade of Guise Street Stage 2 - Creation of lots 5 – 8 + residue lot + Upgrade of Majura Lane + Construction of new road Stage 3 (see Figure 3 – 5) – Creation of Lots 9 – 19 + additional 13.7ha lot and 48.41 residual lot + Creation of right of way.	✓
<b>Power</b>	Underground power to all lots	Underground power to all lots	✓
<b>Effluent Disposal</b>	Each residential lot has a nominated effluent disposal area	Each residential lot + additional lifestyle lot has a nominated effluent disposal area	✓
<b>Potable Water</b>	Each lot will be required to have its own 90KL potable water tank	Each lot will be required to have its own 90KL potable water tank	✓
<b>Landscaping and fencing</b>	Development would be enhanced by entry features, mature street trees, riparian planting, street lighting, and rural style fencing	Development would be enhanced by entry features, mature street trees, riparian planting, street lighting, and rural style fencing	✓
<b>Planning Control</b>			
<b>Regional planning</b>	Yass Valley Council had completed their Local Housing Strategy, and the Southeast Tablelands Regional Plan was in Draft form	Yass Valley Council is about to update their Local Housing Strategy, and the Southeast Tablelands Regional Plan is still in Draft form	✓
<b>Strategic planning</b>	Site identified in original Sutton Masterplan for redevelopment, site specific rezoning, part of overall town growth to c.150 dwg	Site identified in original Sutton Masterplan for redevelopment, site specific rezoning, part of overall town growth to c.150 dwg	✓
<b>Zoning</b>	All residential lots are within the R2 zoned parcel whilst lifestyle lots are located within the R1 zoned parcel	All residential lots are within the R2 zoned parcel whilst lifestyle lots are located within the R1 zoned parcel	✓
<b>Minimum Lot Size</b>	All residential lots comply with the 5,000m <sup>2</sup> MLS, residual lot complies with the 20ha MLS	All residential lots comply with the 5,000m <sup>2</sup> MLS, lifestyle lot complies with the 10ha MLS and residual lot complies with 20ha MLS	✓
<b>Sutton Masterplan</b>	Proposed development is consistent with masterplan	Modified development is consistent with	✓
<b>Sutton Bypass</b>	Provision for proposed Sutton Bypass	Provision for proposed Sutton Bypass	
<b>Environmental Impact</b>			
<b>Stormwater</b>	Conventional street drainage with individual houses discharging to	Conventional street drainage with individual houses discharging to water tanks with overflow to rubble pits	✓

Criteria	Original Development (viz. DA210293)	Development as Modified	Substantially the Same?
	water tanks with overflow to rubble pits		
<b>Effluent Disposal</b>	Development supported by nominated effluent disposal areas all located outside of flood line and 40m riparian buffer	Existing and new development (additional lifestyle lot) supported by nominated effluent disposal areas all located outside of flood line and 40m riparian buffer	✓
<b>Traffic</b>	Nominal increase in traffic to surrounding road network.	Nominal increase in traffic from 3 extra lots to surrounding road network.	✓
<b>Access</b>	Access to cul-de-sac then Majura Lane/Guise Street	Access to cul-de-sac then Majura Lane/Guise Street. Lifestyle lot has direct access to Guise Street	✓
<b>Parking</b>	Adequate parking on site or in wide cul-de-sac with adequate street frontage for pedestrian and cycling movement.	Adequate parking on site or in wide cul-de-sac with adequate street frontage for pedestrian and cycling movement.	✓
<b>Riparian</b>	Development located away from riparian areas which are subject to VMP	Development located away from riparian areas which are subject to VMP	✓
<b>Flooding</b>	Development areas located outside of flood affected parts of the site	Development areas located outside of flood affected parts of the site, inc. additional lifestyle lot	✓
<b>Bushfire</b>	Development located away from APZ which are maintained in perpetuity	Development located away from APZ which are maintained in perpetuity	✓
<b>Sustainability</b>	Lots will require individual water tanks (min 90KL), compliance with BASIX, recycling, composting, optional solar PV etc.	Lots will require individual water tanks (min 90 KL), compliance with BASIX, recycling, composting, optional solar PV etc.	✓
<b>Community Impact</b>			
<b>Local amenity</b>	No comments raised	NA	✓
<b>Overshadowing</b>	No comments raised	NA	✓
<b>Privacy</b>	No comments raised	NA	✓
<b>Noise</b>	Construction issues raised	Unchanged	✓
<b>Visual</b>	Development visible from Majura Lane and central cul-de-sac	Development visible from Majura Lane and central cul-de-sac	✓
<b>Objections</b>			
<b>Resident concerns</b>	Largely limited to big picture issues concerning the Sutton Masterplan and Sutton Bypass	No change as development footprint is the same. The additional lifestyle lot allows better separation of land for the proposed Sutton Bypass	✓
<b>Business concerns</b>	None raised	NA	✓
<b>Affected parties</b>	None raised	NA	✓



## 4.0 Environmental Assessment

### 4.1 Overview

When assessing a 4.55 modification application, councils typically consider the following matters:

- **Nature of the modification:** *Whether the change is considered minor or significant in relation to the original development consent.*
- **Environmental impact:** *Potential effects on local ecosystems, vegetation, drainage, and overall environmental sustainability.*
- **Traffic and access considerations:** *Changes that may increase traffic flow, impact parking availability, or alter site access.*
- **Community impact:** *Any effect on neighbouring properties, including overshadowing, privacy, noise, and visual changes.*
- **Compliance with planning controls:** *Alignment with local environmental plans (LEPs), development control plans (DCPs), and zoning regulations.*
- **Public or stakeholder objections:** *Concerns raised by residents, businesses, or other affected parties during the notification process.*

### 4.2 Nature of the modification

#### ***Is the change considered minor or significant in relation to the original development consent?***

The original development consisted of a subdivision of 17 x large lot residential lots on the R2 zoned land with a residual lot comprising all the R1 zoned land. The subdivision was designed off a new 400m long cul-de-sac 25m wide, 12m turning radius. Lots 1 – 7 will front the existing Majura Lane/Guise Street, whereas Lots 8 to 17 will have property access via the new public road. The residual rural land will utilise the existing access into the property. Each of the large residential lots complied with the minimum 5,000m<sup>2</sup> MLS and provided lots up to 8,270m<sup>2</sup>. Each lot would have comprised a typical family home (or dual occupancy), outbuildings and services.

The changes comprise 19 x large lot residential lots (an extra two) made possible by shortening the 25.0m wide cul-de-sac by relocating the 12m turning radius ~40m to the northwest and by more evenly distributing the exact same developable land across the entire estate. The extra two lots would be accessed off the central cul-de-sac which is adequately designed for this purpose. An extra 13.16ha lifestyle lot (proposed lot 20) is also sought which is naturally separated from the residue by the proposed Sutton Bypass and a different MLS. This extra lot would be accessed off Guise Street to not introduce any new driveways to Sutton Road. A building envelope and effluent disposal area has been sited outside of constrained land i.e. free of riparian and flooding impacts. The residual rural lot therefore reduces in size from 62ha to 48.41ha and will utilise the existing access into the property from Sutton Road. The proposed upgrades to of Majura Lane will remain the same. Services to each of the lots (i.e., power, tank water (min 90KL), and on-site effluent disposal areas) would be the same except for two additional lots. Landscape features such as entry statements, mature street trees, riparian planting, street lighting, and rural style fencing remain unchanged.

The only other stage is the addition of a Stage 0 to allow the R2 development area to be initially subdivided from the parent lot (proposed lots A and B). The other stages 1 – 3 remain substantially the same, wherein Stage 1 involves the creation of lots 1 – 4 + residue lot + Creation of future bypass corridor + upgrade of Guise Street, Stage 2 involves the creation of lots 5 – 8 + residue lot + upgrade of Majura Lane + construction of new road and Stage 3 involves the creation of Lots 9 – 19 + creation of right of way + additional 13.7ha lot and 48.41 residual lot.

## 4.3 Environmental Impact

### ***Do the changes increase any potential effects on local ecosystems, vegetation, drainage, and overall environmental sustainability?***

The changes are largely contained to the existing R2 zoned land which was specifically sited away from the site constraints (i.e., flood and riparian land). This will not change as the extra 2 x residential lots are located within the existing development footprint. The only extra lot is the 'lifestyle lot' provided on the MLS10ha area which is separated by Sutton Road, the R2 boundary and the proposed Sutton Bypass. A building enveloped has been sited on this lifestyle lot.

Specialist advice was sought from either the original consultants (or suitable alternatives) regarding the proposed modification who advised as follows.

#### ***Flora and Fauna - Ecological Australia***

Ecological Australia (ELA) was initially contracted to prepare a Flora and Fauna Assessment (FFA) for the initial development which was then updated in 2019 and 2020 to reflect changes to the proposed design. ELA found that the changes were unlikely to trigger the Biodiversity Offset Scheme (BOS) for the following reasons given:

- The proposal is very unlikely to exceed the native vegetation clearing threshold. The majority of the site is exotic vegetation and <0.05 ha of native vegetation would be impacted by the current proposed lot layout (impacts relating to new fences only).
- The site is not covered by the Biodiversity Values Map, and
- Significant impacts to matters listed under the NSW *Biodiversity Conservation Act 2016* are not considered likely.

ELA were subsequently engaged to undertake a review of the proposed modifications to determine any impacts not previously considered. Their report draws the following conclusion:

*The proposal does not trigger the Biodiversity Offsets Scheme (BOS) under the BC Act as the native vegetation clearing threshold for the property (0.25 ha) is not exceeded by the modified design, no areas mapped as Biodiversity Values will be affected; and a significant impact to threatened entities is unlikely (ELA, 2025).*

#### ***Bushfire (Anderson Environment and Planning)***

Anderson Environment and Planning (AEP) were contracted to provide advice on the proposed modification relating to bushfire considerations in line with the earlier Bushfire Assessment Report (BAR) produced by ember Bushfire Consulting (2021).

AEP note that the entirety of the residential lots i.e., Proposed Lots 1 – 19 are to be managed as Inner Protection Areas in perpetuity i.e., as managed vegetation as is the area around the existing dwelling to the north 36m, east 48m and south and west 50m. With the Subdivision of the 62ha residual R1 land into 2 Lots i.e., Proposed Lots 20 and 21, an additional area within Proposed Lot 20 is identified as requiring management as an IPA - APZ. Based on slope and vegetation present, any future residential dwelling within Proposed Lot 20 will require the following distances: north 25m, and east south and west 22m which should allow any proposed dwelling to meet BAL 12.5 construction standards.

The original BAR identifies construction standards required for each proposed Lot - typically a building limit of 70m from the front of the lots was provided. This assessment retains that 70m limit. Thus, the building envelopes on proposed Lots 9 - 19 are to be restricted in a similar fashion, ensuring all dwellings are built closer than the 70m requirement. Future dwellings on Proposed Lots 10 – 17 are to be constructed to BAL 12.5. Future dwellings on Proposed Lots 1, 3, 4, 6, 7, 8 and 20 will require a

subsequent BAL assessment to determine construction level required in accordance with the applicable standards.

In terms of access, the 8m wide access into the development remains the same but is shortened from approx. 400m to approx. 300m. The performance measures accepted in the original proposal all remain and a 10m wide access running from the Cul-de-sac onto the 10m wide external right of way. Access for Proposed Lot 20 will be off Majura Lane near the corner of Sutton Road, Guise Street and Bywong Street. Any proposed dwelling on Proposed Lot 20 that is located more than 70m from the Majura Lane entry will be required to meet property access requirements set out in PBP 2019.

In summary, accepted performance solutions provided in the original BAR and applying these to the S4.55 modification proposed it is considered that the subdivision development can comply with the specific and broad objectives of PBP 2019 and the requirements of the Rural Fire Regulations (2013). The modification does not substantially change the bushfire management requirements and is broadly in line with the previously issued Bushfire Safety Authority for the subdivision.

### ***Archaeology - Past Traces***

Past Traces were contracted to provide an addendum to their earlier report on the original DA insofar as the effect of the proposed amendment on the recorded Aboriginal heritage sites and AHIP conditions is concerned.

Their original Aboriginal Cultural Heritage Assessment Report (ACHAR) completed in 2021 + Addendum (due to the length of time since the original assessment was undertaken in 2024) allowed for application for an Aboriginal Heritage Impact Permit (AHIP). The 2021 heritage assessment identified three areas of potential archaeological Deposit (PAD), one of which is located within the proposed development area. The locations of the three areas of PAD, along with the return to country location proposed for the recovered artefact. The site within the development footprint (57-2-1113) was subject to subsurface testing and application for an AHIP was recommended. The two remaining areas of PAD (PADST2 and PADST3) are located to the south of the development area and will not be impacted by any of the proposed works.

Following submission of the ACHAR and addendum, AHIP #5394 was issued on the 30/4/2025 by Heritage NSW (DECCEEW) approving impacts to site 57-2-1113 (Sutton 1) located within the subdivision footprint. The location of site 57-2-1113, the approved lot layout and the AHIP area are shown on Figure 2. The approval of AHIP #5394 removes all heritage constraints within the development area. PADST2 and PADST3 are located outside of the development area and are not covered by AHIP #5394. No impacts can occur to PADST2 or PADST3.

The modification for the additional two lots occurs within the development area, where AHIP #5394 has removed all heritage constraints. The additional eastern lot is not within an area of heritage constraint and no impacts will result from the additional lot. The modification will not therefore have any adverse or increased heritage impacts, as the design avoids the remaining two areas of PAD which remain within the larger block boundary. The modified design does not impinge on the Return To Country location of the excavated artefact on the southwestern boundary.

Past Trace find that the amended subdivision layout results in nil impact to Aboriginal heritage, outside of the approved AHIP for site 57-2-1113. The AHIP conditions of Completion of Harm Report (Condition 12) and updated Site Impact Recording Form (Condition 19) and Return to Country (Condition 18) are still applicable and require completion following impacts to Site 57-2-1113. The Return to Country can be completed at any stage when convenient for the property holder. The completion of the Return to Country will be documented in the Harm Compliance Report and submitted to Heritage NSW on completion of works.

Given the development has extended southwards closer to the two-remaining area of PAD it is recommended that the two heritage areas (PADST2 and PADST3) are marked on construction mapping as a no-go zone, and that all construction traffic avoids crossing the areas of PAD. Temporary barrier

fencing should be installed with a 10m buffer at the PAD boundary, or at the southern development boundary to prevent accidental impact prior to works commencing. The temporary fencing should consist of, as a minimum, star pickets with hi visibility flagging.

In accordance with AHIP conditions if the AHIP Permit Holder is altered, an amendment to the AHIP with the new permit holder name is required. Notification of Aboriginal registered parties in accordance with Condition 4 was completed on the 1/5/2025. Stop work and unexpected finds procedure and all remaining AHIP conditions must be adhered to.

### ***Flooding – Chase DM***

The original DA was supported by a stormwater review undertaken by Lyall and Associates (2021). The report found that the proposed development would not be impacted by flood flows generated by the upper McLaughlin's Creek catchment in events up to and including the PMF.

Chase DM completed a review of the previously approved stormwater review (See Appendices) in the context of the proposed modifications. It was found the modifications 1 and 2 would have no impact on the findings of the original report. The review also analysed the impact that flood flows would have on the proposed building envelope and OSSM Disposal area for Lot 20, as proposed by Modification 3. This review finds that the proposed building envelope, OSSM and Driveway are not impacted by flooding.

### ***Land Capability (Soil and Water)***

Franklin Consulting Australia Pty Ltd (trading as Soil and Water) were contracted to provide an addendum to their earlier report on the original DA.

They advise that all lots will dispose of domestic effluent on-site via independent effluent treatment and disposal systems (Aerated Wastewater Treatment System) to help offset the potable water requirements for each lot. Moreover, that there are adequate areas of suitable site and soil conditions located on the proposed residential Lots 1 – 19, to enable the on-site dispersal of effluent in association with the proposed dwelling sites. Some of the lots adjacent to the adjacent drainage depressions will be partially constrained by drainage buffers. The location of dwelling and effluent system layout and design will need to accommodate these constraints

Proposed Lot 20 is moderately constrained by the dam and drainage buffers associated with the drainage depressions flowing west from culverts beneath Sutton Road as well as an area constrained by the drainage buffer along the main central watercourse. There are also small areas of dryland salinity and seasonal waterlogging which are constrained for onsite effluent disposal. There is however, a large area of unconstrained land which is suitable for onsite effluent disposal and dwelling construction outside the constraints identified on the lot.

The existing effluent management system on proposed Lot 21 will not be impacted by the proposed subdivision and is therefore considered adequate to continue to manage effluent generated from the existing dwelling.

The modification of the development will not adversely impact groundwater or surface water resources providing it is implemented in accordance with the recommendations of this report and relevant Council conditions. The development will not adversely impact dryland salinity, nor will it be adversely impacted by this issue.

In terms of Potable water supply for the existing and proposed dwellings will be through the independent capture and storage of roof water in potable water tanks.

Full copies of the specialist reports are included in the **Appendices** to this report.

## Summary

To summarise the potential environmental impact, the following comments can be made:

- The 19 x residential lots can be serviced by effluent disposal areas sited away from site constraints such as flooding/riparian and existing vegetation.
- The additional lifestyle lot (i.e., proposed lot 20) can be readily accessed off Majura Lane/Guise Street and its building envelope and effluent disposal areas can also be sited away from flood affected land and 40m riparian buffer as depicted on the plans submitted.
- The new layout can be accommodated within the existing stormwater network which consists of street drainage to the local creek system with individual houses discharging to water tanks (min 90KL), with overflow to rubble pits.
- There would be nominal increase in traffic and parking to the surrounding road network from the 3 extra lots. The proposed cul-de-sac is wide enough to provides on-street parking with adequate street frontage for pedestrian and cycling movement
- The existing and proposed development is located away from riparian areas which are subject to VMP, outside of flood affected parts of the site and away from APZ which are maintained in perpetuity
- Sustainability measures will remain as is with all lots required to have individual water tanks (min 90KL), compliance with BASIX, recycling, composting, optional solar PV etc
- Bushfire Asset Protection Zones (APZs) are all maintained by the proposed modifications and the 40m buffer zones are identified on the updated plans submitted.
- Groundwater Impacts of the proposed development have been reviewed by Soil and Water, the updated reporting confirms that adverse impacts on the surrounding water courses and groundwater are mitigated.

## 4.4 Traffic and Access Considerations

### ***Are there changes that may increase traffic flow, impact parking availability, or alter site access?***

Access to the 25.0m wide cul-de-sac remains of Majura Lane/Guise Street which is proposed to be upgraded. There is adequate parking on site or in the wide cul-de-sac which has adequate street frontage for pedestrian and cycling movement. There are no appreciable changes in traffic flow, parking or site access regarding the extra two lots within the estate or the new lifestyle lot off Majura Lane/Guise Street.

## 4.5 Community Impact

### ***Are there any changes regarding neighbouring properties, including overshadowing, privacy, noise, and visual impact?***

When the original DA was advertised there were no concerns raised with regards to likely impacts on adjoining properties. The development team has consulted with the Sutton Community Association on this modification and included a brief within their June newsletter. As at the time of completing this report, no adverse comments had been received on the proposed modification.



## 4.6 Compliance with Planning Controls

### ***Do the changes align with local environmental plans (LEPs), development control plans (DCPs), and zoning regulations?***

The changes are compliant with Council's LEP, DPC and zoning regulation. The site was initially identified in original Sutton Masterplan for redevelopment and was subject to a site-specific rezoning a few years ago. It is part of the plan to grow the village to around 150 dwellings. The changes better align with Council's long-term plans to develop a Sutton Bypass as the alignment would now be located on the boundary of two new lots (but wholly contained within proposed lot 21) in a 'restricted developable area' as opposed to being in the middle of a single lot.

Yass Valley Council is about to update their Local Housing Strategy, and the Draft Southeast Tablelands Regional Plan is still in Draft form. The changes are still consistent with Council's long-term plans to develop a Sutton Bypass in this location.

All residential lots are within the R2 zoned parcel whilst lifestyle lots are located within the R1 zoned parcel. All residential lots comply with the 5,000m<sup>2</sup> MLS whilst all lifestyle lots comply with the 10ha MLS or 20ha MLS.

## 4.7 Public or stakeholder objections

### ***Do the changes affect the concerns raised by residents, businesses, or other affected parties during the notification process?***

When the original DA was advertised there were 6 submissions lodged which largely commented on 'big picture' issues concerning the long-term growth of Sutton. The issues raised include:

- The need for a bypass and provision of such within the proposed development
- The potential for loss of important habitat trees along Guise Street
- The ongoing maintenance of creek and public access thereto (i.e., formalised walkway/cycleway)
- Impacts during construction (noise, dust etc.)
- Need for landscaping within the estate
- Some lots within the estate are awkward shapes and the layout should be based on a grid pattern like the rest of Sutton

Many of these issues were addressed in Council's assessment of DA210293 and the conditions of consent. The proposed changes do not prejudice any of these matters as the new development is largely constricted to the existing footprint. Council's position with respect to the Sutton Bypass remains unchanged.

Feedback received from the community on this modification has been positive, with many comments noting the modesty of the proposed amendment.

## 5.0 Conclusion

Sydney-based developer RSF Pty Ltd has reached commercial terms relating to the sale of 2155 Sutton Road, Sutton (Lot 1 in DP 32236) currently owned by long-term resident Mr Phillip Keir. The property was the subject of a development consent DA210293 issued by Yass Valley Council for an 18-lot subdivision (17 x R2 residential lots and 1 x RU1 rural lot) and upgrade of Majura Lane/Guise Street.

To affect the transaction, a separate 'development lot' must be created by way of a super lot (paper) subdivision. A separate lifestyle lot could also be separated as it is already 'separated' by the proposed Sutton Bypass and a different MLS provision. The subdivision of the 17 x R2 residential lots can also produce 2 extra lots by shortening the main cul-de-sac and by averaging the developable land evenly across all the lots within the R2 zoned section and yet still comply with the 5,000m<sup>2</sup> minimum lot size (MLS) provision.

Preliminary discussions with Yass Valley Council have confirmed that the proposed modifications are 'substantially the same development' and Council would accept a modification pursuant to s.4.55(2) EPAA provided all matters were adequately addressed in a modification report.

RSF Pty Ltd has now engaged Chase DM Pty Ltd to prepare this modification report to be lodged with Council to updated plans that clearly illustrate the proposed modifications, provide any necessary technical or specialist reports and prepare this report specific to the Modification.

The planning controls affecting the site i.e., Strategic Plans, LEP, DCP have not changed since the original DA was approved. We understand that Yass Valley Council is about to commence work on their updated Settlement Strategy. The Draft Southeast Tablelands Regional Plan remains in Draft form.

The proposed modification would fall into the category of 4.55(2) – Other Modifications given it is more substantial but still does not result in a fundamentally different development from that which was approved. Section 4.55(2) provides that a consent authority may modify the consent if it is satisfied that the development is substantially the same development as the development for which consent was originally granted and it has consulted with relevant stakeholders and notified the application and considered any submission made in respect of the modification.

A comparison table and environmental assessment has been prepared comparing the Original Development (viz. DA210293) to Development as Modified against various assessment criteria such as the nature of the change, planning controls, environmental impact, community impact and objections. The modified development will remain largely unchanged in terms of land use, access of Majura Lane, lot size, services, fencing and landscaping, infrastructure, developable land, strategic planning (i.e., compliance with the Sutton Masterplan), environmental assessment, site constraints (i.e., bushfire, effluent disposal, flooding, riparian and visibility). On this basis, the consent authority can be satisfied that the development to which the consent as modified relates is 'substantially the same' development.

Findings of this assessment:

- The change is considered minor or significant in relation to the original development consent.
- The potential effects on local ecosystems, vegetation, drainage, and overall environmental sustainability have been appraised by a team of experts who collectively find the impacts minimal and virtually identical to the previous approved scheme.
- There are minimal changes to traffic flow, impact parking availability, or site access.
- The effect on neighbouring properties, including overshadowing, privacy, noise, and visual changes is minimal and remains unchanged.
- The proposal complies with relevant LEPs, DCP and applicable regulations.
- Concerns raised by residents, businesses, or other affected parties during the notification process were minimal or have been addressed.

## Appendices

1. Deposited plan by Snowy Surveyors
2. Subdivision Design by Chase DM
3. Bushfire Report by AEP
4. Flora and Fauna Report by Ecological Australia
5. Flooding Review by Chase DM
6. Aboriginal Archaeological Reports by Past Traces
7. Land Capability Report by Soil & Water