MEMORANDUM

To: The Design Advisory Board  
From: Mary O’Neil, AICP, Principal Planner  
RE: ZP-22-32 Cambrian Rise (351-375 North Avenue, various addresses Cambrian Way)  
Date: February 22, 2022

File: ZP-22-32  
Location: Cambrian Rise (329 -351-375 North Avenue, 35, 65, 70 and 300 Cambrian Way)  
Zone: NAC – CR  
Ward: 4N  
Parking District: Multi Modal Mixed Use.  
Date application accepted: January 16, 2022  
Revised drawings February 10, 2022.  
Applicant/ Owner: Eric Farrell

Request: Changes to Cambrian Rise:

- Acknowledge execution of Amendment to Development Agreement, increasing allowable housing density from 770 to 950 units;  
- Increase in calculated FAR from 1.16 to 1.36. (2 is allowable FAR);  
- Combine previously approved buildings D, E, F and I (total area of 185,000 sf) into one structure: the Aurora (305,000 sf);  
- Eliminate deck and push wall out at fourth floor south elevation to create new units in Building C; (elevation change);
• Change in configuration of Buildings Q/R.
• Creation of Common Green (reconfigured Lot 6);
• Addition of 2 units to Building M, 6th floor on northwest corner by conversion of amenity space, enclosure of open deck.
• Site modifications, including addition of a rooftop Boardwalk as resident amenity.
• Change to Phasing Plan (sequencing, not completion dates.)

Background (329, 351, 351-375 and 375 North Avenue; 35 and 65 Cambrian Way):

• **Zoning Permit 21-0636CA**: re-apply for 18-0781CA; revisions to Buildings B & G with additional floor added to Building B. No change to total units in project; revision to design of buildings and proposed transportation hub; revision to road phasing plan. January 2021.

• **Zoning Permit 21-0166CA**: re-purpose 4000 sf of commercial area on the first floor of the existing building into 4 additional apartments, increasing the total number of residential unit in the Rise from 90 to 94. August 2020.

• **Zoning Permit 20-0683CA**: changes to proposed Building C including minor elevation changes, conversion fo one parking level to residential units for a total of 125 units in Building C; decrease non-residential space to a total of 3,000 sf in Building C, construct additional temporary surface parking spaces. Amend project phasing plan. February 2020.

• **Zoning Permit 19-0427CA**: proposed changes to approved Building C to include enclosure of SE top floor corner balconies to create 2 additional units for total of 102 units; reducing 2nd, 3rd and 4th floor balconies. Altering entrance at north elevation; introduce wood feature on northeast corner commercial space. December 2018.

• **Zoning Permit 18-0791CA**: revisions to Building B & G with additional floor added to Building B. No change to total units in project, revisions to design of buildings and proposed transportation hub, Revision to road phasing plan. May 2018, permit expired.

• **Zoning Permit 18-0721CA**: relocation of proposed path on SW side of building to align with existing opening on west elevation and small path leading from main path to vicinity of electrical transformer. Modified paths near entry until adjacent building are complete; temporary black coated chain link constructuvion fencer surrounding west and south boundaries of building landscaping; new low stone wall. March, 2018.

• **Zoning Permit 17-0896SD**: Final Plat for 9 lot subdivision (3 existing and 12 proposed lots). May 2017.

• **Zoning Permit 17-1307A**: temporary fence and path for temporary dog park for residents of 375 North Avenue. June 2017.

• **Zoning Permit 17-0853CA**: Request for amendment of ZP17-0623CA/MA; Condition of approval #13 limiting construction days and times and Condition #3 addressing 10 year performance bond for construction. May 2017.
• **Zoning Permit 17-0716CA**: replace two small windows on north and south gable ends located at the west elevation of former orphanage building with one larger window in each gable end at the west elevation. January 2017.

• **Zoning Permit 17-0623CA/MA**: construct development consisting of 11 buildings containing 739 residential units, approximately 45,000 sq. ft. of non-residential support/amenity space, approximately 40,000 sq. ft. of neighborhood commercial spaces and 1,092 parking spaces. Approved March 8, 2017 and amended May 1, 2017.

• **Zoning Permit 17-0376CA**: install new windows within new opening on western building elevation. September 2016.

• **Zoning Permit 17-0267SD**: Preliminary plat review of 11-lot subdivision. No development included. October 2016.

• **Zoning Permit 17-0252SP**: second sketch plan review of planned unit development with mixed commercial and residential uses, related buildings, and infrastructure. October 2016.

• **Zoning Permit 17-0010CA**: revision to west chapel elevation (amendment to zoning permit 16-0007CA/MA); openings for windows restored or added. July 2016.

• **Zoning Permit 16-1487CA**: change to top floor (Orphanage building), add veranda on roof. Amendment to zoning permit 16-0007CA/MA.

• **Zoning Permit 16-0622CA**: request change of materials for existing slate roof to standing seam copper on the former St. Joseph’s Orphanage. Former address is 351 North Avenue. January 2016.

• **Zoning Permit 16-1183SP**: Sketch plan review of 700+ unit planned unit development with mixed commercial and residential uses, related buildings, and infrastructure. June 2016


• **Zoning Permit 16-0007CA**: Amendment to 63 unit apartment approval to include removal of 1st floor assembly space, add 2 living units and 2 parking spaces, relocate/redesign west entrance with associated landscape changes. Also add small fenced in dog park, grilling patio, utility pad, and indoor bike parking spaces. February 2016.

• **Zoning Permit 16-022CA**: remove slate roof and install copper. Approved January 2016.

• **Zoning Permit 16-1077MP**: Tree maintenance plan. Approved November 2015.

• **Zoning Permit 16-0651LL (329 North Avenue)**: Lot line adjustment with 311 North Avenue. December 2015.

• **Zoning Permit 16-0015CA**: Addition of curb cut and drive to 351 North Avenue. September 2015
- **Zoning Permit 16-0007CA/MA**: convert orphanage to 63 residential units. Approved September 2015. Amended February 2016 to increase to 65 residential units and minor exterior alterations. (see above.)

- **Zoning Permit 15-0702LL** (351 North Avenue); Lot line adjustment with 329 North Avenue. Approved December 2014. [Plat recorded 1/16/2015; Plat file 509C.]

- **Zoning Permit 15-0701LL** (329 North Avenue); Lot line adjustment with 351 North Avenue. December 2015.

- **Zoning Permit 14-1286CA**: Installation of CCTA bus shelter on Burlington College property. Approved June 2014.

- **Zoning Permit 12-0706SN**: replace existing non-conforming freestanding sign with new freestanding sign for Burlington College – Main Campus. Approved March, 2012.

- **Zoning Permit 12-0121CA**: Install rooftop air handler, five ac units, bike racks, and remove walls from garage. Approved August 11, 2011.

- **Zoning Permit 11-0282CU**: convert existing institutional office use and group home use to post-secondary school. No site or exterior building changes proposed. Approved November 2010.

- **Zoning Permit 09-526CA**: Demolish single car garage. Approved February 2009.

- **Non-applicability of zoning permit requirements**: continued use of existing group home. June 1998.

- **Zoning Permit 92-096 / COA 092-016**: Removal of existing wooden cross with installation of fiberglass statue of St. Mary on top of Diocese building. Overall height to be 104’ with exterior illumination to surround statue. Approved September 1991.

- Notice of selective landscape removal on west. No change in grade of site or drainage of runoff water. December 1991.


- **Zoning Permit 77-03**: renovation of existing structure “St. Josephs Child Center” into office space and three apartments for Bishop and two priests. Approved January 1977.

- **Zoning Permit 77-628**: Convert St. Joseph’s Child Center into office building, three apartments and three guests’ rooms. Remove some windows and brick up openings. Install new windows. Erect 28’6” x 30’ addition and 32’ x 66’ addition. December 1976.

**Overview**: Cambrian Rise is an approved PUD with 14 buildings across 12 parcels. Several permits have been issued for revisions to individual buildings, phasing, and site arrangement since the project was originally approved in March 2017. This overarching amendment will reflect additional housing units (see Memorandum, dated April 23, 2020, and First Amendment to the Development Agreement, June 2020), changes to buildings DEFI, M, C and Q/R as well as site and changes to building sequencing.
Part 1: Land Division Design Standards

This is an approved Planned Unit Development, with individual interior lot numbers. In the introductory memorandum, the applicant notes:

The Subdivision Plat will eventually be revised; however we have many details that remain to be finalized. Therefore we intend to submit a separate application soon that will depict an adjustment of some boundaries between certain lots and may also involve the consolidation of lots.

Although as a PUD only periphery setbacks are evaluated, it is important to understand interior lot lines as some buildings proposed for revisions will cross those previously established subdivision lot lines. Amending those lot boundaries will be essential.

As these “lots” have now been assigned street addresses, future permit review could and should be isolated to individual lots rather than the PUD in its entirety. This would allow for manageable permit review in more “consumable” portions, and easier permit tracking for future review.

Part 2: Site Plan Design Standards

Sec. 6.2.2 Review Standards

(a) Protection of Important Natural Features:

One of the primary natural features of the site is the sloping grade toward the bike path and Lake Champlain. Site changes have sought to further enhance this prospect; with selected landscaping and amenity features to retain view and access to the west while enhancing residential features. Smaller sized trees and shrubs have been used within the central portion of the project so as to avoid obstruction of highly scenic views. Larger shade trees will be employed to soften areas along roads and between buildings.

(b) Topographical Alterations:

Grading has been adjusted and retaining walls incorporated to screen visibility of revised vehicular circulation and parking from public roads and pedestrian areas. Refer to Plans L-201, L-202 and L-206 for revisions to the landscaping layout.

This image is included to illustrate grading and landscaping revisions. Building DEF (Aurora) has since been revised.
Alterations to previously approved plans include a westerly expansion of Building D that now includes a multi-use rooftop amenity area or “Boardwalk”. The latter affords views along the central axis of the project toward the lake and mountains.

(c) Protection of Important Public Views:
While there are no specific regulatory requirements to protect public views in the NAC-CR district, the revisions to this plan reaffirm the applicant’s commitment to identify and highlight the spectacular scenic views to the west. The substantial effort to assure residential amenity space is a highpoint of this plan; whether through the newly design Common, the Boardwalk, firepits and outdoor recreation areas, rooftop spaces or community gardens.

(d) Protection of Important Cultural Resources:
Burlington’s architectural and cultural heritage shall be protected through sensitive and respectful redevelopment, rehabilitation, and infill. Archeological sites likely to yield information important to the city’s or the region’s pre-history or history shall be evaluated, documented, and avoided whenever feasible. Where the proposed development involves sites listed or eligible for listing on a state or national register of historic places, the applicant shall meet the applicable development and design standards pursuant to Sec. 5.4.8(b).

See supporting submission of VHB regarding impacts to historic resources.

(e) Supporting the Use of Renewable Energy Resources:
Plans illustrate the opportunity for solar array on the roof of the combined DEF building. At the very least, this building should be constructed “solar ready” in an effort to forward renewable energy resources.
(f) Brownfield Sites:
The Vermont DEC website does not include these addresses. Not applicable.

(g) Provide for nature's events:
Special attention shall be accorded to stormwater runoff so that neighboring properties and/or
the public stormwater drainage system are not adversely affected. All development and site
disturbance shall follow applicable city and state erosion and stormwater management
guidelines in accordance with the requirements of Art 5, Sec 5.5.3.

A fully developed Stormwater Management Plan was prepared and approved within the original
application (17-0623CA/MA.) The changed unit count will require re-review of some overall
items: A water and sewer capacity analysis with Water Resources, any required updates to the
Stormwater plan and a firm timeline for subsurface infiltration systems with DPW.

Design features which address the effects of rain, snow, and ice at building entrances, and to
provisions for snow and ice removal or storage from circulation areas shall also be
incorporated.

Previous approvals have included the manner for snow removal and storage activities. This is
annotated on Plan L-201.

Reference is made to elevation plans for Building DEF to confirm covered entries both along
North Avenue, and Cambrian Way where multiple entrances/lobbies are available.

Building M and C are proposed for upper floor enclosures or additions (entries not proposed for
alteration.)

Building Q/R will be “straightened” in footprint (not curved, as previously approved) but will
retain entrance details.

Building Q/R, view westerly from North Road. Note “straightening” of building footprint.
(h) **Building Location and Orientation:**

Building DEF is a revision to the formerly E/F building, and Building I which has been eliminated. Differing from early iterations, this new building now claims the entire length of the block, and presents three street frontages. In orientation, the narrow end fronts North Avenue (set 20°3’ from the easterly property line, consistent with setback requirements for buildings fronting North Avenue) and runs westerly along Cambrian Way (“North Road”) to its intersection with “West Road.”

i) **Vehicular Access:**

Circulation patterns have been somewhat altered: There is a through-road “Main Entry Underpass” roughly midway along the North Road segment that allows the P2 garage entrance and trash/recycling/compost to be relocated away from the roadway. Vehicular circulation and parking connect between the North and South Road sections of Cambrian Way. Circulation and parking have also been connected along the western portion of the project, between Building P and Q/R. These alterations have allowed the central corridor to expand and allow better access to westerly views. Curb cuts were adjusted along the North Road segment of Cambrian Way to address the revised building configuration.
(j) Pedestrian Access:
Pedestrian circulation remains similar to the original approval, with alterations and reconfigurations central to the site and reflecting the increased amenity / Common area. Pedestrian circulation retains enhanced connections to the Bike Path.

(k) Accessibility for the Handicapped:
The revised layout maintains the ADA accessible route through the center of the project which includes access to a stair and elevator in Building D. The route connects to the proposed recreation path through the new Kieslich Park and provides a fully accessible route between North Avenue and the Waterfront Bike Path.

(l) Parking and Circulation:
See Vehicular Access above.
The plan reflects a 1,349 parking spaces, 985 (73%) are understory, 364 (27%) are surface parking. (1.42 per unit) [Zoning Permit 21-0636CA recorded 1040 spaces.] Since the last PUD amendment, City Council has amended the zoning ordinance to include the Multi Modal Mixed Use (MMMU) Parking District, incorporating Cambrian Rise and eliminating minimum required parking standards. The project retains pre-existing approval for the number of parking spaces on site. Previous applications have incorporated a robust Parking Management Plan which has informed new requirements for a Transportation Demand Management plan. See Cambrian Rise Transportation Demand Management Plan (Revised 12.20.2021). A full assessment of parking requirements and limitations as allowed by Article 8 will be part of DRB review.
A Traffic Impacts memo from Wall Consulting Group is included within application materials. In short, the analysis anticipates an overall reduction in traffic impacts primarily because housing generates less traffic than many commercial uses.

(m) Landscaping and Fences:
Reference is made to Plan L-201, L-202 and -206 for landscaping details. The landscaping plan has been revised to site layout revisions; smaller sized trees and shrubs are utilized within the central portion of the project so as to avoid obstruction of highly scenic views. Larger shade trees will soften areas along roads and between buildings. Retaining walls are incorporated to screen visibility of vehicular circulation and parking from public roads and pedestrian areas. (See Inset 1 and 2.) Hardscape features are included to provide private and common gathering areas.

(n) Public Plazas and Open Space:
Revisions to Cambrian Rise have created a large Common / Central Green at the westerly edge of Lot 6; providing opportunities for event space, recreational activities, or quiet resident enjoyment. Additionally the plan provides for a Boardwalk (atop Building D), and a larger contiguous usable open space within the westerly corridor. New amenities include a fenced off-leash dog area, grilling areas with seating and tables, fire pit locations, and rooftop gardening opportunities. A greenhouse is identified atop DEF/Aurora, near rooftop community garden space. The applicant asserts that the proposed Community Gardens atop the Aurora will be a first for Burlington.

(o) Outdoor Lighting:
Where exterior lighting is proposed the applicant shall meet the lighting performance standards as per Sec 5.5.2.

Revised outdoor lighting utilizes fixtures originally approved, including 20’ tall parking lot fixtures and 12 ½’ pedestrian fixtures. Street lighting will remain unchanged.
The maximum illumination level for the parking lots remains at 4 footcandles.

(p) Integrate infrastructure into the design:
Exterior storage areas, machinery and equipment installations, service and loading areas, utility meters and structures, mailboxes, and similar accessory structures shall utilize setbacks, plantings, enclosures and other mitigation or screening methods to minimize their auditory and visual impact on the public street and neighboring properties to the extent practicable.

Utility and service enclosures and screening shall be coordinated with the design of the principal building, and should be grouped in a service court away from public view. On-site utilities shall be placed underground whenever practicable. Trash and recycling bins and dumpsters shall be located, within preferably, or behind buildings, enclosed on all four (4) sides to prevent blowing trash, and screened from public view.

Any development involving the installation of machinery or equipment which emits heat, vapor, fumes, vibration, or noise shall minimize, insofar as practicable, any adverse impact on neighboring properties and the environment pursuant to the requirements of Article 5, Part 4 Performance Standards.
All conditions relevant to this section previously approved shall remain in effect. New utility connections shall be undergrounded. The proposed drive-through from North Road allows the location of trash/recycling/compost to be located away from the roadway.

Part 3: Architectural Design Standards
Sec. 6.3.2 Review Standards

(a) Relate development to its environment:

1. Massing, Height and Scale:

Building DEF: (“The Aurora”)
While unique to Burlington’s overall residential housing stock, buildings within Cambrian Rise have a commonality to them: Modern, multi-planed and of large scale. This elongated, contiguous structure runs the entire block between North Avenue and “West Road”, undulating in the plane of its street façades to provide relief from its sheer length and breadth. The former St. Joseph’s Orphanage set a scale for the Avenue, clearly the largest and most imposing singular structure prior to Cambrian Rise. Building DEF is a literal expansion of the Cambrian Rise model into one of larger gauge, creating a connected structure of 318,000 sf (an increase from the original 185,000 sf of D, E, F and I as originally approved.)

The connected cubical blocks that form the Aurora display a complex arrangement enhanced with balconies, differing window arrangements, contrasting materials, and alternating wall planes of recesses and pavilions that break up the sheer expanse. The plan reflects a methodology
of breaking up larger masses into “readable” segments, each with a formula and rhythm for wall and window arrangement. The lower 4/5 floors of Sections 6, 7, 8, 9 (north elevation) emphasize a vertical arrangement, while the upper floors (sheathed in a darker siding) are clearly more horizontal. The plan changes on the westerly end (Sections 1-5) where darker sheathing on the lowest levels and strings of balconies and canopies above visually stretch the building horizontally. Fenestration and material organization provide overarching organization to the whole.

Building heights are limited to 65’ (77’ with IZ bonus). See plans L-EX3 and L-EX3a as revised. Zoning Amendment 21-07 altered the methodology for calculating roof height, which is now measured in no less than 65’ intervals within 50’ of a frontage line. These plans now reflect the zoning revision. Height bonuses allowed for IZ (65’ + 12’) are now demonstrated with the required 10’ setback from the height allowed by right. Calculations provided in L-EX3 and L-EX3a exhibit this new methodology employed for Buildings DEF, M and C.

Due to the sloping grade and as allowed by Section 5.2.6 (b) 6, the administrative officer may allow up to a 5% variation in the maximum building height to address grade changes. The applicant requests such consideration for discrete areas of DEF; particularly Section 1S, 1N, 4 and 5. The 5% allowance is best understood in this context. Sections 4 and 5 are mid-block and reflect the dip in the grade at that point. An analysis of allowable building height for Sections 2, 3 6, 7, 8, 9, and 10 shows the plan provides less than the maximum height for those sections; also a reflection of the drop in grade at the mid-point of the building. As revised, the plan is compliant with the height allowances afforded by the Comprehensive Development Ordinance, and meets the required 10’ building plane setback for the IZ height bonus.

**Building M:**
This application includes a request to add 2 residential units to the northwest corner of Building M. The units will be created by conversion of an enclosed resident amenity space, and enclosure of an open deck. Calculations on plan L-EX3 show a height based on a building height average + 77’ (height allowance with IZ bonus.)
Building “M” as proposed, with two new residential units on the northwest corner. Compare to approved plan of ZP 19-0021CA/MA, below.

Building “M” as approved under ZP19-0021CA/MA.
Building Q/R:
Revisions to this connected building is merely to straight out the building footprint, and “open” the central corridor for unobstructed views to the west. Building height remains unchanged from the original approval.

Building C

This application proposes the elimination of a balcony/roof deck and addition of new enclosed space on the fourth floor. The modified section of the roof is at grade 270’, less than the 65’ base height allowance afforded from grade 211’. As proposed, the expansion is compliant with the modified height calculation methodology.
2. *Roofs and Rooflines.*

All buildings are proposed with flat roofs. Renderings for DEF show the potential for extensive solar array; roof top decks, gardens, a greenhouse, sheds, kitchen and dining areas with seating and fire tables. Screening is provided around centralized mechanical equipment; with the elevator towers and a greenhouse specifically exempt from height limits.

3. *Building Openings*

Building DEF has rhythmically placed building openings, consistent with the tempo of the façade and cadence of the building’s mass. Arrangement is organized, maximizing options for views and light. Lobbies, entrances and vehicular entries are arranged logically, providing ample opportunities for residents to access the building and circulate to the interior of the site.

(b) **Protection of Important Architectural Resources:**

Reference is made to the VHB submission.

(c) **Protection of Important Public Views:**

See Section 6.2.2 (c) above.

(d) **Provide an active and inviting street edge:**

Building DEF (“The Aurora”) presents an interesting face to North Avenue, “North Road” and “West Road” on Cambrian Way. Highly articulated building planes with orderly arrangement of building elevations present a complex whole. The plan employs variations of building plane and architectural features, providing interest while avoiding undifferentiated expanses of structure. The tension between horizontal and vertical elements of the composition; windows, balconies, materials, and voids ease the overarching reality of scale. On the north elevation, the darker sheathing materials along the highest floors visually “flatten” perceived height, and the regularly spaces lighter vertical components break up the horizontal breadth into more comfortable segments.
The building follows the westerly grade, stooping into the hillside as the topography changes. Height conforms to allowable limitations (77’ max set back 10’ from the base height with IZ bonus) with relief considered for the mid block segments. Section 5.2.6 b. 6. offers an administrative 5% height differential where grade changes are pronounced; this project illustrating a situation where best and minimally employed.

Certainly uncommon to Burlington, the building introduces the design sophistication of multi-unit urban residential buildings more common to much larger metropolitan centers like Toronto.

If any part of the first floor of Building DEF is proposed to be non-residential, visual access into the interior of building must be provided at the street level through the use of large transparent windows and/or window displays in order to assure a dynamic and engaging public streetscape. In that instance, the use of mirrored, frosted, or tinted glass shall not be permitted along an active pedestrian street-level façade.

(e) **Quality of materials:**

All development shall maximize the use of highly durable building materials that extend the life cycle of the building, and reduce maintenance, waste, and environmental impacts. Such materials are particularly important in certain highly trafficked locations such as along major streets, sidewalks, loading areas, and driveways. Efforts to incorporate the use of recycled content materials and building materials and products that are extracted and/or manufactured within the region are highly encouraged.

Exterior sheathing and materials for Building DEF is a mixture of fiber-cement panels, faux wood slats and fiberglass windows. All are considered acceptable for new construction.

(f) **Reduce energy utilization:**

All new construction shall meet the Guidelines for Energy Efficient Construction pursuant to the requirements of Article VI. Energy Conservation, Section 8 of the City of Burlington Code of Ordinances. New structures should take advantage of solar access where available, and shall undertake efforts to reduce the impacts of shadows cast on adjacent buildings where practicable, in order to provide opportunities for the use of active and passive solar utilization.

Post construction RBES and/or Commercial Energy Standards confirmation for energy efficiency will be required. Solar – ready construction is highly encouraged for Building DEF.

(g) **Make advertising features complementary to the site:**

Any signage will require separate permitting.

(h) **Integrate infrastructure into the building design:**

See Section 6.2.2. (p) above.

(i) **Make spaces secure and safe:**

All building and life safety codes, as defined by the building inspector and the fire marshal, shall remain applicable.
Building entrances/entry points shall be visible and adequately lit, and intercom systems for multi-family housing should be incorporated where possible, to maximize personal safety.

Section 5.4.8 Historic Buildings and Sites

Reference is made to the analysis provided by VHB relative to potential effects on historic properties.

Items for consideration:

- Impact fees will be recalculated to reflect the gross area of Buildings DEF (the Aurora), M, and C.
- The applicant team shall keep a running spreadsheet of all buildings with a breakdown of area and uses.
- A revised TDM will be subject to review by the DRB.
- The applicant must communicate with Water Resources to provide an updated schedule of installation of the infiltration system. A revised letter of WW capacity is also needed.
- The applicant shall submit an application to reflect boundary line adjustments within the PUD to align revised building footprints with lots and a corresponding phasing schedule.
- The applicant requests an adjustment to the sequencing of construction phases, which is understandable and likely acceptable; however the omission of completion dates for each phase is problematic. Zoning permit life is defined, and in this case, directly linked to an applicant-defined phasing schedule. Anticipated completion dates must be provided and linked to a phasing schedule; subject to review by the DRB.
- All conditions imposed in earlier permit approvals not herein altered shall remain in effect.