

16 March 2026

Our Ref: R/2022/24/D
File No: 2026/130171
Your Ref: SSD-32275057

James Groundwater
Department of Planning, Housing and Infrastructure

Via Major Projects Portal

Dear James,

Advice on Modification Report – Redfern Mixed Use Co-living Housing Development – Modification 2 – SSD-32275057

Thank you for your correspondence dated 27 February 2026 inviting the City of Sydney Council (the City) to comment on SSD-32275057 for modifications to the approved development including a reduction to the basement design, upper-level internal design changes, roof top plant and stormwater.

The City provides the following advice and recommendations:

1 Waste and Servicing

Whilst the City is supportive of the proposed removal of car parking spaces from the development, the City maintains its position that a new residential land use should be designed to be capable of being serviced by a Council standard domestic waste collection vehicle. The City previously objected to the SSDA being serviced through a private collection service and the use of a 6.8m long Small Rigid Vehicle (SRV).

The Sydney Local Environmental Plan 2012 defines a co-living land use as a form of 'residential accommodation'. Due to this classification, Council's standard domestic waste collection service should be accommodated on this site in accordance with Section 496 of the Local Government Act 1993.

Notwithstanding the SSDA consent, as the application is removing on-site parking from the basement, it is considered that there is opportunity with this modification to reconsider the basement planning and layouts to accommodate a Council garbage collection truck. There are opportunities to review bicycle storage design to facilitate this, and the design of the ramp and basement are capable of modification to be capable of accommodating the minimum truck size of 10.6m.

A rationalisation of the proposed bicycle parking and lockers (as further discussed further below) could allow adequate space for a 10.6m truck within the site and remove the need for private collection for this development.

Notwithstanding the above position of the City, where the Department continues to support a development of this typology that is serviced by private waste collection, then the proposed basement must be modified so that there is a designated (and line marked) loading bay provided. The siting of any loading bay must ensure that it considers safety of other users of the basement (i.e. bicycle riders and pedestrians moving throughout the basement from storing their bikes).

Inadequate General Waste Generation Assessment (Residential)

The proposed development includes undersized and inadequate designated waste storage area to service a development of this size when assessed against the City's guidelines.

The bin allocation to be recalculated based on weekly collection/s and demonstrate if the proposed waste storage area is sufficient to accommodate the required bins and infrastructure.

It is recommended the waste storage requirements be recalculated and then subsequently, that the design of the basement be amended to ensure adequate provision of storage rooms is accommodated on site. These areas should be redesigned to meet the City's requirements, a copy of these has been included at Appendix A of this letter.

Bicycle parking

In order to facilitate a redesign of the basement layout and its functionality to accommodate a 10.6m truck and required areas for waste storage, the City suggests the Department give consideration to the City's DCP amendments in relation the design of bicycle storage - see the Sydney [DCP 2012 – policy and housekeeping - amendments](#). These DCP amendments will enable greater flexibility in the design of the bicycle facilities, and could assist in rationalising the bicycle storage requirements for the development through a change to a Class 2 (secure room) facility rather than the number of individual lockers.

Further information on the DCP amendments can be found here: <https://www.cityofsydney.nsw.gov.au/policy-planning-changes/your-say-updates-planning-controls-related-greening-amenity-parking-design-excellence>

No objection is raised to reduction in non-residential (staff/ visitor) spaces, noting that this represents a minor variation against rates in accordance with this amended DCP and when balanced against other merits of the development including high proportion of resident bicycle parking/ reduced provision of car parking, can be accepted.

Conditions

The following conditions should be updated to include Council as a referral/ endorsement agency:

- E33 – Transport Access Guide
- E36/ E37 – Green Travel Plan
- E34 - car parking, loading and servicing management plan

2 Street Frontage Activation

The City is of the view that a number of changes to the ground floor layout has resulted in a poorer outcome for streetscape presentation and street activation. The following matters are raised:

- The relocation of the hydrant booster should not be supported as it removes landscaping and sits on the outside of the building on its Cleveland Street primary frontage. This further diminishes the interface of this frontage and results in a poor public domain outlook. It should remain on Woodburn Street where it is well integrated into the building.
- Removal of the community multipurpose room and replacement with reception is a lesser outcome and inconsistent with the public and social benefit offer as outlined in the '*Updated RTS Report*, dated February 2024, p11' that formed part of the development consent.
- The site is mapped in the City's DCP as requiring an active frontage. The removal of the previously approved commercial floor space for "co-working" space (assumed to be just for use by residents of the development) is contrary to this as it results in the under delivery of commercial floor space and limited street activation with the public.

Elevations

The ground floor changes have impacted the building's elevations and its relationship with the street. It is requested that the following be addressed:

- High quality loading access/garage door needs to be retained on Eveleigh Street as to not visually dominate this facade.
- Clarification is required of how the now open stair to the basement, accessed from the Eveleigh Street through-site-link will be secured, as it was approved behind a secure line. Further to this, there appears to be greater conflict of the public and private use of this proposal, and the intention of what spaces will be secure or not from what was original approved.
- Removal of windows adjacent the public domain on Woodburn Street should not be supported as these are mapped active frontages. An increase in windows should be provided where services have been removed.
- The relocation of the booster to the landscape area along the Cleveland Street frontage that sits directly below operable windows on level 1 should not be supported.
- There is significant loss of privacy to the Level 1 rooms, which are located close to the footpath. This issue formed part of the original approval and was resolved by providing higher window sill heights, this element must be retained.

Materiality

The proposed material changes show a reduction in material quality and introduce a reference of "or similar", which is ambiguous and does not demonstrate design excellence. The lack of nominated high quality colours and finishes adds to the poor visual presentation to the street frontages and should be further refined.

3 Internal Visual Privacy

Internal room to room separation (as amended)

The original approval had in excess of 12m internal building separation between the rooms and windows.

The modification seeks to modify the allocation of double and single rooms. This reconfiguration and change in room spatial requirements for the northern end of the courtyard has resulted in a reduction in the internal building separation across the internal courtyard, which does not meet the 12m separation of the ADG.

Room to walkway separation

The ADG requires gallery access circulation to be treated as habitable space. Condition B3 of the SSSA approval was imposed and required operable external privacy treatments for rooms facing the internal courtyard, as well as the lowest windows facing all 3 street frontages. It is noted that the requirements of this condition have not been shown or met by this modification.

DESIGN MODIFICATIONS – PRIVACY TREATMENTS

- B3.** Prior to the issue of the Construction Certificate, the Applicant must submit to the satisfaction of the Certifier, revised plans which demonstrate the following:
- (a) Operable external privacy treatments for courtyard facing rooms which enable simultaneous user control of visual privacy and daylight/solar access; and
 - (b) Operable external privacy treatments for lowest level rooms facing Cleveland / Eveleigh / Woodburn Streets.

This reduction in internal building separation should not be supported and the design modification for privacy treatment must be addressed on the plans.

4 Roof Plant Changes

The relocation of the plant enclosure closer to Cleveland increases the perceived and visible overall height of the development as viewed from the public domain. This results in a negative visual impact.

The plant location was approved in a less visually intrusive and the least sensitive location. However, the proposed location is close to the edge of the roof and now make it highly visible on Eveleigh Street.

5 Landscaping

- Compared with the approved plans, landscaping and tree planting over the deep soil area on the ground floor has been reduced and replaced by paving. The ground floor courtyard layout should be revised to maximise landscaping and support a minimum of four canopy trees over the deep soil area.

- The modified design has a large expanse of unprogrammed paving at the through site link entrance from Woodburn Street. Therefore, additional shade tolerant planting should be provided in this area.
- Landscaping plans should confirm that there is a minimum of 1m soil depth to support the proposed trees over the basement level.
- The door leading from the level 5 common room to the main communal roof terrace only has approximately 1m clearance on the inside and is restricted by furniture. This should be reviewed to better connect the common room to the main outdoor terrace.
- Facade planting has been extended on the northern elevation immediately outside the stairwell on levels 2-4. The areas immediately behind the stair well have limited maintenance access and it is recommended that they are deleted.
- A new facade planter is proposed on the western elevation on level 5, outside the south-western stairwell. This area also has limited maintenance access and it is recommended that it is deleted.
- It is suggested that an updated set of landscape drawings is provided with this modification so that the stamped landscape plans (which are referenced in condition B15) are also updated.

6 Stormwater

No issue is raised to the proposed modification, however the City notes that the amended location of the OSD will require the approval from Sydney Water. This should be conditioned accordingly together with the City's Stormwater Drainage conditions.

Should you wish to speak with a Council officer about the above, please contact Kaitlin McCaffery, Specialist Planner, on 9246 7240 or at kmccaffery@cityofsydney.nsw.gov.au.

Yours sincerely,



NICOLA REEVE
Area Planning Manager

Appendix A – Waste and Servicing Requirements

Waste and Recycling stream/s to be provided in accordance with Councils waste generation rates detailed in Reference A of the Guidelines.

The bin allocation for each stream to be rounded to the next whole number using the rates in Reference A of the Guidelines.

A maximum collection frequency of once a week to be explored with supporting on-site infrastructure to accommodate the bin volumes.

The proposed collection frequency utilises twice weekly collections, this arrangement is not permitted. As per Reference B of the Guidelines, *"Minimum collection frequency is once per week. Council will only consider more frequent collection services for approval where it is satisfied that all other options to deliver sufficient storage capacity have been exhausted."*

The bin allocation to be recalculated based on weekly collection/s and demonstrate if the proposed waste storage area is sufficient to accommodate the required bins and infrastructure.

Advice note: It is recommended to select larger bin sizes to reduce the total number of bins. The City's preference is for 1100 L bins for general and recycling waste, and a maximum of 240 L for food waste.

Food scraps

Protection of the Environment Legislation Amendment (FOGO Recycling) Act 2025 (Part 5A.2, Section 170E) mandates the provision of FOGO as a mandatory waste stream for multi-unit dwellings, in addition to standard general waste and recycling. As per Section B.3.2 & (3.6) of the Guideline, for waste streams not collected via a chute system (in this case, FOGO), adequate space must be provided on each residential level for the storage and collection of those bins with the maximum 30m distance from the unit.

The Waste Management Plan (WMP) proposes Food Bins within the basement and the travel distance from the units exceeds the maximum travel distances. This does not permit all assigned waste streams on each of the respective residential levels and is therefore not supported and should be addressed.

Chute Discharge Room

As per Section B.3.5 of the Guidelines, residents should not have access to chute discharge room due to WHS concerns. The plans to be updated to show the chute discharge room is enclosed and provides physical separation inhibiting resident access.

Servicing

Integrated on-site waste collection to be provided for standard waste collection vehicle in accordance with section A.3.6 of the Guidelines. To demonstrate unobstructed access, a supporting swept path analysis with sufficient clearances to be provided to demonstrate compliance with the Australian Standard (AS2890.2) provisions for the proposed collection vehicle (MRV).

Appendix B – Recommended Conditions of Consent

The City's standard model conditions should be imposed to help ensure the City's digital and physical models remain up to date.

The conditions read as follows:

(1) PHYSICAL MODELS

- (a) Prior to the issue of any Occupation Certificate an accurate 1:500 scale model of the development as constructed must be submitted to and approved by Council's Area Coordinator Planning Assessments/Area Planning Manager for the City Model in Town Hall House.

Note:

- (i) The models must be constructed in accordance with the Model Specifications available online at <http://www.cityofsydney.nsw.gov.au/development/application-guide/application-process/model-requirements> Council's modellers must be consulted prior to construction of the model.
- (ii) The models are to comply with all of the conditions of the Development Consent.
- (iii) The models must be amended to reflect any further modifications to the approval (under Section 4.55 of the *Environmental Planning and Assessment Act*) that affect the external appearance of the building.

Reason

To ensure the provision of an appropriate physical model of the development.

(2) SUBMISSION OF ELECTRONIC CAD MODELS PRIOR TO OCCUPATION CERTIFICATE

- (a) Prior to any Occupation Certificate being issued, an accurate 1:1 electronic CAD model of the completed development must be submitted to and approved by Council's Area Coordinator Planning Assessments/Area Planning Manager for the electronic Visualisation City Model.
- (b) The data required to be submitted within the surveyed location must include and identify:
- (i) building design above and below ground in accordance with the development consent;
- (ii) all underground services and utilities, underground structures and basements, known archaeological structures and artefacts;
- (iii) a current two points on the site boundary clearly marked to show their Northing and Easting MGA (Map Grid of Australia)

coordinates, which must be based on Established Marks registered in the Department of Lands and Property Information's SCIMS Database with a Horizontal Position Equal to or better than Class C.

The data is to be submitted as a DGN or DWG file on a Compact Disc. All modelling is to be referenced to the Map Grid of Australia (MGA) spatially located in the Initial Data Extraction file.

- (c) The electronic model must be constructed in accordance with the City's 3D CAD electronic model specification. The specification is available online at <http://www.cityofsydney.nsw.gov.au/development/application-guide/application-process/model-requirements> Council's Modelling staff should be consulted prior to creation of the model. The data is to comply with all of the conditions of the Development Consent.

Reason

To ensure the provision of an appropriate electronic model of the development.