

2 June 2026

Brent Devine
Team Leader, Key Sites and TOD Assessments
Department of Planning, Housing and Infrastructure
12 Darcy Street,
Parramatta NSW 2150

Attention: Adam Flynn

Dear Adam,

**Response to Request for Additional Information – SSD-4949-Mod-9
157-163 Cleveland Steet Mixed Use Redevelopment**

This letter has been prepared by Colliers Urban Planning on behalf of the Trustee for Scape Australia (Cleveland) Trust (the Applicant) in response to a request for additional information regarding the City of Sydney Council's (Council) comments on the modification application. A response to Council's comments are provided in **Table 1**.

Table 1 *Response to City of Sydney Council comments*

Council Comment	Response
The definition of co-living housing within the Sydney Local Environmental (LEP) means • a building or place that— • a) has at least 6 private rooms, some or all of which may have private kitchen and bathroom facilities, and • b) provides occupants with a principal place of residence for at least 3 months, and • c) has shared facilities, such as a communal living room, bathroom, kitchen or laundry, <i>maintained by a managing agent, who provides management services 24 hours a day,</i> While the proposed off-site system fulfils part of the role of a 'managing agent', the City raises concerns around reduced safety, security and support for the 461 students on site.	The proposed development, inclusive of utilisation of Scape Safe, meets the definition of co-living housing as Scape is the managing agent, and will provide management services which are available 24 hours a day, including through Scape Safe which will respond generally within 15 minutes around the clock. The definition does not require the managing agent to be on-site 24 hours a day. Safety, security and support will be improved. A centralised offsite safety and incident management system is a safer and more effective incident response arrangement that will benefit residents. There is currently requirement for one onsite caretaker, who can only attend to one incident at a time, may be difficult to locate on a site if they are already attending an incident, or may be sleeping during night time periods. As such, unlike traditional caretakers who may be unavailable, whether asleep or attending to other matters, ScapeSafe removes these limitations as the centralised hub is immediately contactable 24/7 and has multiple roving patrols within a 15 minute radius that can be deployed simultaneously to different Scape sites. This ensures that someone is always ready to respond. With guaranteed immediate action. The responses provided below provide further detail on why Scape Safe provides improved safety, security and support for the residents.
The proposal provides a lack of detailed information around the following: • Where the centralised off-site safety hub is located with the Local Government Area.	The Scape Safe Hub, which serves as the centralised monitoring centre, is located in Marrickville. Physical response capability is maintained through security personnel on continuous roaming patrol within the City of Sydney precinct. Rather than being stationed at a fixed location, responders operate within approximately 4-5 kms of the property, enabling quick on-site attendance when required.

Council Comment	Response
What the response time to student issues is.	This information was provided in the original submission. Generally, the response time is 15 minutes.
How this system provides the same or better safety for the resident as an on-site manager.	Unlike a traditional on-site manager who is available on request, Scape Safe operates as an active, always-on safety system. The model combines continuous CCTV monitoring, proactive patrols, and a dedicated response capability for alerts and incoming resident requests. Where an on-site manager is by nature reactive, responding only when approached, Scape Safe is designed to identify and respond to safety concerns before they escalate. This shift from passive availability to active monitoring and patrol represents a materially higher standard of safety coverage for residents.
Contingency plans for when the external system fails or is not working	Scape Safe is supported by a multi-layered contingency framework designed to maintain continuous operation in the event of a system failure or outage. Operationally, the Scape Safe team can activate from alternative Scape properties within the Randwick Council and City of Sydney areas, as well as from corporate headquarters on George Street, ensuring no single point of failure in physical operations. On communications, the system is not reliant on a single network. In the event of primary network failure, Scape Safe maintains connectivity through radio, satellite, and mobile phone networks, with failover to a third-party network and direct escalation pathways to the Scape management team. Together, these redundancies ensure that residents retain uninterrupted access to safety support regardless of the nature or duration of any outage.
The effectiveness of the '15 minute roving patrols', who they are and how they operate.	Roving patrols are licensed security guards. Scape Safe Hub oversee and deploy the security guards to ensure response times are met, patrols and inspections are completed, and any resident support is actioned or escalated as required.
How residents access and use the system within the building e.g. is it an app, online, button on the wall and/or intercom system.	Residents can reach Scape Safe at any time through two channels: an onsite intercom system, and by phone. Both connect residents to a trained responder without requiring an app download, or internet connection, ensuring access is available to every resident.
Whether the system is DDA accessible.	Scape Safe is designed to be accessible to all residents, including those with disability. Where a resident requires additional support, the Property Manager completes a Personal Emergency Evacuation Plan (PEEP) that documents the resident's preferred communication methods, specific support requirements, and emergency contact details. This information is shared directly with the Scape Safe team, ensuring that any response to that resident is informed, tailored, and consistent with their documented needs from the outset.
In the absence of this information, the City does not support the removal of the requirement for an on-site staff member 24 hours per day, 7 days a week. Where the proposed off-site centralised system is supported, the Department must be satisfied that it provides the same level of safety and response as an on-site manager.	Based on the above responses, and the originally submitted modification report and plan of management, the Department can be satisfied that Scape Safe provides not just the same, but improved level of safety and response as an on-site manager.

Level 4/180 George Street, Sydney NSW 2000

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We trust that the information addresses the Department's request for additional information and will facilitate a determination.

Please do not hesitate to reach out to the below with any queries or advice.

Sincerely,

A handwritten signature in black ink, appearing to read "J Yuen", written in a cursive style.

Jethro Yuen

Principal

Jethro.Yuen@colliers.com