

142-160 Oxford Street, 13 Gipps Street and 6 Shadforth Street, Paddington – Operational Waste Management Plan

A Submission to Toohey Miller

28 May 2026



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Disclaimer

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In the spirit of reconciliation MRA Consulting Group acknowledges the Traditional Custodians of Country throughout Australia and their connection to land, sea and community. We pay our respects to Aboriginal and Torres Strait Islander peoples and to Elders past, present and emerging.

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Glossary

Terminology	Definition
AS	Australian Standard
C&D	Construction and Demolition
C&I	Commercial and Industrial
DA	Development Application
DCP	Development Control Plan
ENM	Excavated Natural Material
EPA	Environment Protection Authority
LGA	Local Government Area
MGB	Mobile Garbage Bin
MRA	MRA Consulting Group
MSW	Municipal Solid Waste
WDCP	Woollahra Development Control Plan 2015
WLEP	Woollahra Local Environmental Plan 2014
VENM	Virgin Excavated Natural Material
WMP	Waste Management Plan
WSP	Waste Service Provider
WSRA	Waste Storage and Recycling Area

1 Executive Summary

This Operational Waste Management Plan has been prepared by MRA Consulting Group to accompany a detailed State Significant Development Application (SSDA) for the proposed mixed use residential flat building and shop development proposal at 142-160 Oxford Street, 13 Gipps Street and 6 Shadforth Street, Paddington. The site is legally described as Lot 1 DP26385, Lot 2 DP26385, Lot 3 DP26385, Lot 4 DP26385, Lot 1 DP70235, Lot 5 DP26385 and SP13018.

This report has been prepared to accompany the EIS submitted for SSD DA, SSD-97528708.

This report concludes that the proposed development is suitable and warrants approval subject to implementation of the following mitigation measures.

Table 1: Summary of mitigation measures

Mitigation Measure	Design	Construction	Operational	Relevant Section of the Report
A private waste service provider will be engaged to collect all waste streams from both residential and non-residential components of the development.			X	Section 4.5
The bin collection point (loading dock) and access driveways will be designed in accordance with AS 2890.2 <i>Parking Facilities – Off-Street Commercial Vehicle Facilities (2002)</i> to accommodate the specifications of the nominated collection vehicle (a SRV mini rear loader).	X			Section 4.5
Waste collection vehicles will be required to reverse into the designated loading zone for servicing.			X	Section 4.5
Waste collection will be scheduled during daytime off-peak periods and outside the hours of 10:00 pm to 7:00 am to maintain safety and minimise noise and disruption.			X	Section 4.5
Dedicated space for a composting unit has not been formally allocated within the development; however, the communal garden area provides sufficient room to accommodate a small-scale composting system for residential organics, should building management choose to implement one.			X	Section 4.2

Following the implementation of the above mitigation measures, any impacts will be acceptable and appropriate.

2 Introduction

This Operational Waste Management Plan (hereafter referred to 'Waste Management Plan' (WMP)) has been prepared by MRA Consulting Group to accompany a detailed SSDA for the proposed mixed use residential flat building and shop development proposal at for the proposed mixed use residential flat building and shop development proposal at 142-160 Oxford Street, 13 Gipps Street and 6 Shadforth Street, Paddington.

The SSDA seeks development consent for:

- Site works comprising excavation and ground works including bulk excavation and in ground services works.
- A four (4) storey basement, with vehicular access from Shadforth Street, comprising of:
 - Car parking spaces;
 - Motorcycle spaces;
 - Bicycle spaces;
 - Garbage storage;
 - Loading space;
 - Plant rooms; and
 - Apartment storage.
- Ground floor shops.
- A total of approximately 44 dwellings, comprised of:
 - Affordable housing dwellings to be managed by a community housing provider for a period of at least 15 years.
 - Market build-to-sell dwellings.
- Landscaping works and extension and augmentation of services and infrastructure as required, including landscaping works on 13 Gipps Street.

This report has been prepared in response to the requirements contained within the Secretary's Environmental Assessment Requirements (SEARs) for In-fill Affordable Housing dated 3 November 2025 and issued for the SSDA (SSD-97528708). Specifically, this report has been prepared to respond to the SEARs requirement issued below.

Table 2: Planning Secretary's Environmental Assessment Requirements

SEARs Item	Description of Issue and Assessment Requirements	Sections in this Report
17. Waste Management	Provide the measures to be implemented to manage, reuse, recycle and safely dispose of waste, including in accordance with any council waste management requirements	Sections 4
	Identify appropriately sited waste storage areas, collection access paths/roads, and appropriate servicing arrangements for the site.	Sections 3.2, 3.3, 4.4, 4.5 Appendix A

This report addresses the requirements of Consent Authority (NSW Department of Housing, Planning and Infrastructure (DPHI)) and conforms to the following environmental planning instruments and reference documents:

- Woollahra Local Environment Plan 2014 (WLEP)
- Woollahra Development Control Plan 2015 (WDCP)

Consideration has also been given to the following supplementary documents in the preparation of the Operational WMP:

- NSW EPA (2019) *Better Practice Guide for Resource Recovery in Residential Developments*.

The WMP has been prepared in accordance with the WDCP 2015, and states the following objectives for waste management:

- To assist applicants in planning for sustainable waste management, through the preparation of a site waste minimisation and management plans;
- To identify on-site requirements for waste and recycling storage and management, having regard to access and amenity;
- To ensure waste management systems are compatible with collection services;
- To minimise noise and nuisance arising from waste and recycling collection, having regard to the need to balance operational needs and functions of businesses with the amenity of nearby residential uses, particularly between 10 PM and 7 AM.

This WMP addresses waste generation, and storage associated with the ongoing occupation of the proposed use and is used to inform the building design to deliver best practice waste management at the operational phase of the development. The waste management requirements for the operational phase of the project has been addressed separately by MRA in a separate report.

2.1 Site Description

The site is irregular in shape and situated at 13 Gipps Street, 6 Shadforth Street and 142-148, 160 Oxford Street, Paddington within the Woollahra Local Government Area (LGA). It has a site area of 2,172.4m². The site is legally described as Lot 1 DP26385, Lot 2 DP26385, Lot 3 DP26385, Lot 4 DP26385, Lot 1 DP70235, Lot 5 DP26385 and SP13018.

The site is well located with a bus station directly in front of the site on Oxford Street which provides services to Bondi Junction, Rozelle and Marrickville Metro Station and less than 600m away further east of Oxford Street, bus services are provided to the Sydney CBD. The broader context includes a mix of uses of various heights, form and age. The site comprises of three (3) street frontages, including a northern frontage to Gipps Street, eastern frontage to Shadforth Street and southern frontage to Oxford Street.

Existing development on the site currently comprises of a detached two (2) storey rendered residential dwelling at 13 Gipps Street, a three (3) storey brick and rendered residential flat building at 160 Oxford Street with 27 studio dwellings, a row of two (2) storey terrace houses between 142-148 Oxford Street and a two (2) storey brick cottage at 6 Shadforth Street. Notably, there are two vehicular accessways to Gipps Street.

Figure 1: Site and surrounding areas



Source: Nearmap, 2025.

2.2 Strategies

Waste management for the site considers better practice, necessary equipment, and integration with other guidance documents, including the NSW Waste and Sustainable Materials Strategy (NSW EPA, 2021), and National Waste Policy: Less Waste, More Resources (DAWE, 2018). The key policy aims that are considered are:

- Avoidance (to prevent the generation of waste);
- Reduce the amount of waste (including hazardous waste) for disposal;
- Manage waste as a resource; and
- Ensure that waste treatment, disposal, recovery and re-use are undertaken in a safe, scientific and environmentally sound manner.

Management of waste generated onsite according to directives of the NSW Strategy will assist in achieving the target of 80% diversion from landfill in the C&D sector.

2.3 Assumptions

This report is an Operational WMP, forming part of the development documentation and assumes:

- Drawings and information that have been used in waste management planning for this WMP are the final design set for the development plan from the project architect, Smart Design Studio, 21/05/2026;
- Waste and recycling volumes are based on information provided by the WDCP 2015; and
- This WMP is a living document and therefore, waste management equipment and systems described in this report are subject to change based on future operations and available technology.

3 Operational Waste Management

3.1 Overview

The development aims to develop an eight (8)-storey mixed-use development provisioning 44 dwellings, including 11 affordable housing units and 33 private market units, and retail tenancies at the Lower Ground level.

Operational waste management requirements at the site arises from the activities associated with the proposed residential and commercial components of the development. Waste management strategies related to site operations have been established in accordance with the controls in *Section E5 – Waste Management* of the WDCP 2015 and NSW EPA guideline documents.

The following space calculations are based on the mobile garbage bin (MGB) and bulk bin dimensions sourced from NSW EPA's *Better Practice Guide for Resource Recovery in Residential Developments* (2019).

Table 3: Mobile Garbage Bin (MGB) and Bulk Bin capacity and footprint

Bin Capacity (L)	Height (mm)	Depth (mm)	Width (mm)	Footprint (Approx. m ²)
240	1,100	735	580	0.41- 0.43
660	1,250	850	1,370	0.86-1.16

Source: NSW EPA's *Better practice guide for resource recovery in residential developments* (2019).

3.2 Residential Waste Management

3.2.1 Waste Generation

The WDCP 2015 outlines the following generation rates as guidance for new multi-unit residential developments:

- 120L of residual waste per residential dwelling;
- 55L of recyclables per residential dwelling stored in colour coded, shared use, 120L and/or 240L mobile garbage bins;
- 240L shared use mobile garbage bins for food and garden organics.

As the WDCP 2015 doesn't specify a weekly generation rate for organics waste, a rate of 25L/unit/week is adopted as per the NSW EPA (2019) *Better Practice Guide for Resource Recovery in Residential Developments*. Based on MRA's experience, multi-unit developments like this typically generate minimal garden organics due to the limited private garden areas associated with each dwelling.

Accordingly, Table 4 represents the weekly waste generation expected from the residential aspect of the development.

Table 4: Weekly Waste Generation Volumes

Units	Waste Stream	Generation rate (L/unit/week)	Weekly Volumes (L)
44	General Waste	120	5,280
	Recycling	55	2,420
	Food and Garden Organics (FOGO)	25	1,100

3.2.2 Residential Chutes

On-site chute systems will be implemented in the building as it is the most efficient collection method for high-rise developments.

- The building will incorporate four chute cores, with two cores servicing the development from Level 1 and above.
- Each chute system will include an e-diverter to support separation of general waste and recyclables, with outlets discharging into respective bins stored in dedicated chute rooms.
- Each habitable level will have access to chute hoppers stored in bin cupboards for disposing general waste and recyclables.
- Residents will dispose of organic waste into the bins provided within the main residential waste storage areas on Basement 1, which will be conveniently accessible via lifts.

3.2.3 Waste Storage Requirements

The residential bin requirements presented in Table 5 are based on estimations of bin type and Council's weekly waste collection service for general waste, recycling and FOGO.

Table 5: Residential waste storage and bin type

Waste Stream	Weekly Volumes (L)	Waste management (bins and collection frequency)	Minimum Space Required (m²)
General Waste	5,280	8 x 660L collected weekly	14*
Recycling	2,420	4 x 660L collected weekly	7*
FOGO	1,100	5 x 240L collected weekly	3.5*
Bulky / other waste	Bulky / other waste collected as required		10**
Total Approx. Storage and Handling Area			34.5

*Note: *Includes handling and manoeuvring space of bin footprint m² x (1.5)*

***WDCP 2015 doesn't specify an area requirement for bulky waste. So, 10m² will be provisioned as per the NSW EPA (2019) Better Practice Guide for Resource Recovery in Residential Developments.*

Building management will monitor bin fullness once the site is operational and adjust bin quantities if required. An extra 660L bin for general waste and recycling will also be provided as spares, totalling in four (4) bins for each stream, to ensure continuity of chute use during collection periods.

3.2.4 Waste Storage Areas

Chute rooms

Each chute core will be fitted with two outlets discharging into 660-litre bulk bins for general waste and recycling, stored within individual chute rooms. With each core servicing an average of 10 units, the estimated daily waste volumes per core are:

- General waste – 171.5L/chute core/day
- Recycling – 79L/chute core/day

Accordingly, each chute room is sized to house one 660-litre bin for general waste and one 660-litre bin for recycling. The provisioned bins have sufficient capacity to accommodate general waste and recycling volumes of at least two days' generation. Building management will monitor bin fullness, replace full bins with empty bins stored in the main bin room, and check bin contents to minimise contamination.

Bin storage areas

A residential bin storage room will be provided on Basement 1, with an area of approximately 40m² (see Appendix A). This room will function as the central storage area for all general waste and recycling bins awaiting weekly collection. It will also store the spare bins required to service the chute cores. Access to this room will be restricted to building management.

A separate room for FOGO bins and bulky waste, sized at 15m², will be located next to the main bin room. This room will be accessible to residents for the disposal of organics and bulky items.

3.2.5 Temporary waste storage and disposal

Each dwelling will be provided with sufficient space to store receptacles capable of accommodating at least one day's worth of general waste, recycling, and FOGO waste. These receptacles may be located under the kitchen benchtop or in another accessible location that has minimal impact to residential amenity in terms of odour or visual appearance.

Residents will be responsible for transferring general waste and recyclables from their dwelling to the chute hopper located on their respective floor, within the designated bin cupboard. Residents will take organic waste down to the combined FOGO and bulky waste room for disposal into the respective bins.

Lobby and communal areas:

Interim waste containers will be provided within lobby areas and communal amenities, with capacity to accommodate at least one day's generation of general waste and recycling. Cleaning staff will empty these bins daily and transfer the contents to the residential bin storage area, noting that these spaces are accessible only to residents.

3.2.6 Bulky waste storage

Bulky waste items include those that cannot be disposed of in general waste and recycling bins, including but not limited to broken/damaged/old whitegoods, furniture, appliances, mattresses, etc. Bulky waste will be stored in the dedicated room in the Basement 1 to temporarily store bulky goods waiting collection.

3.2.7 Collection Schedule

Waste generated from the residential component of the building is proposed to be collected weekly by a nominated private waste service provider (WSP) collection. Building management will coordinate a suitable bulky waste collection schedule with the contractor and ensure collections occur promptly to prevent overfilling of the bulky waste room.

3.3 Commercial Waste Management

3.3.1 Waste Generation

Operational waste management addressed in the following section relates to waste generation associated with the proposed commercial uses onsite. The development proposes to use of part of the Lower Ground floor of the subject building for non-food retail tenancies. It is noted that each internal commercial tenancy will require a separate application and approval for use and fit out works.

Rates for retail shop use have been taken from Table 1 of Chapter E5.6 – Commercial and non-residential developments in the WDCP 2015. Weekly generation rates in Table 6 are based on a 7-day operational week.

Table 6: Retail waste generation

Use type	Total area (m ²)	Waste Stream	Generation Rate (L/100m ² /day)	Total Weekly Generation (L)
Retail shops	160	General waste	50L/100m ² /day	392
		Recycling	50L/100m ² /day	280
		Paper and cardboard*	-	280
		Food waste**	-	168

*Note: *General retail uses are expected to generate a proportion of paper/cardboard waste of total recycling. For the purpose of estimating the waste generation of this stream, 50% of recycling waste is assumed to comprise paper and cardboard. Building management may choose to separate this stream.*

*** Food waste may be required to be managed as part of the overall retail waste management arrangement.*

3.3.2 Waste Storage Requirements

Waste storage space has been calculated considering estimations of bin type and collection frequency, as described in the table below (Table 7).

Table 7: Retail waste storage and collection frequency

Waste stream	Waste generation (L/week)	Waste management (bins and collection frequency)	Minimum Storage Area (m²)*
General waste	392	2 x 240L bins collected once per week	1.5
Co-mingled recycling	280	1 x 240L bin collected 1-2 times a week	1
Paper and cardboard*	280	1 x 240L bin collected 1-2 times a week	1
Food waste**	168	1 x 240L bin collected once per week	1
Bulky / other waste	Bulky / other waste collected as required		4
Total Approx. Storage and Handling Area			8.5m²

*Note: *Includes handling and manoeuvring space of bin footprint m² x (1.5)*

240L bins are expected to be most suitable for the collection of all three streams to allow for easier manoeuvrability and servicing. Building management can observe the bin fullness levels once the site is fully occupied and adjust the number of collections accordingly.

A commercial bin storage room, sized at 10m², will be provided in Basement 1 to accommodate waste management infrastructure detailed in the table above.

3.3.3 Temporary Waste Storage

Interim containers within retail areas will be available sufficient for one day's generation of at least general waste and recycling. Cleaning staff will be responsible for the emptying of these bins daily and transporting waste to the site's commercial bin storage area.

3.3.4 Bulky Waste

Space for storage of bulky waste resulting from the commercial component of the development is available within the waste storage and recycling area or within BOH areas. Bulky waste removal will be organised promptly with the nominated waste collection contractor to avoid overspill into common areas or corridors.

3.3.5 Collection Schedule

Waste generated from the commercial component of the building is proposed to be collected by the nominated WSP at a collection up to twice a week for general waste and recycling (co-mingled and paper and cardboard), and weekly for food waste. Building management will coordinate a suitable bulky waste collection schedule with the contractor and ensure collections occur promptly to prevent overfilling of the bulky waste room.

4 Operational Waste Management Systems

4.1 Waste Management System Summary

The following specific management methods are proposed for the various collection waste streams expected to be generated at the site, including alternative waste streams outside of general waste, recycling and organics:

- **General Waste:** General waste shall be placed within a tied plastic bag prior to transferring into collection bins. For collection purposes, general waste shall be stored within a mobile garbage bin (MBG).
- **Commingled Recycling:** All recyclables will be stored in commingled bins (mixed plastic, paper, cardboard, glass, aluminium, steel). All recyclables should be decanted loose (not bagged) with containers un-capped, drained and rinsed prior to disposal into the recycling bin. Paper should be flattened and placed in paper and cardboard bin if applicable.
- **Garden Waste:** It is expected that landscaping at the site will be maintained by an external contractor who will remove all vegetation waste from ongoing maintenance activities.
- **Paper and Cardboard:** Should large quantities of paper and cardboard waste be generated from the site's commercial uses a separate service may be suitable for application at the site. The contracted waste service provider may be able to provide separate paper and cardboard bins for the source separation and collection of paper and cardboard waste.
- **Food Waste:** Commercial tenants can make arrangements for the separate collection of its organics by its waste management contractor. Food waste can be stored in 240L sealed bins or refrigerated waste storage prior to collection.
- **Other (Problem) Waste:** The disposal of hard, bulky, electronic, liquid or potentially hazardous wastes shall be organised between the operator and site users as necessary.

4.2 Food Waste

Residential

The Food Organics Garden Organics (FOGO) Recycling Bill 2026 (the bill) has been passed by both parliaments on the 19th February 2025. The bill states that all NSW local councils are required to have a weekly FOGO collection service in place by the 1st July 2026. For more information on the bill see Appendix B.

Food organics generated by the development may be managed on-site should building management choose to implement small-scale organics treatment. Suitable systems include compact composters, dehydrators, worm farms or macerators, which can produce soil conditioners, compost or vermiculture castings for on- or off-site use. Where treatment outputs meet acceptable standards, discharge of effluent or processed material to sewer as trade wastewater may be permissible.

Sufficient space is available within the communal garden to accommodate a small-scale composting system for residential organics if pursued by building management.

Commercial

The Food Organics Garden Organics (FOGO) Recycling Bill 2025 (the bill) has been passed by both parliaments on 19th February 2025. The bill states that all NSW businesses with a weekly residual waste capacity of >3,840L, 6 x 660L bins or 16 x 240L bins are required to have a Food Organics collection service in place by the 1st July 2025. Collections for these businesses need to occur weekly to avoid odour and hygiene complications associated with food waste. Food waste is not to be mixed with non-organic material upon collection according to the bill.

The Bill also exempts relevant premises with a weekly residual waste capacity of <720L, 1 x 660L bin or 3 x 240L bins. Based on the waste volumes estimated in Section 3.3.1, the proposed commercial component falls below this threshold and is therefore exempt from the NSW business criteria under the Bill. Notwithstanding this exemption, dedicated space and bins for food waste have been included to support improved landfill diversion outcomes. The commercial component is expected to generate approximately 168 L of FOGO waste per week, and the provision of 1 x 240L bin collected weekly is recommended to accommodate this volume.

4.3 Waste Management and Recycling Method

The flow of **residential waste and recycling** goes from generation to collection through several steps:

1. Waste is temporarily stored within the dwelling at its point of generation in an appropriately sized receptacle, clearly marked for type of waste (for example, in the kitchen);
2. Residents are to transfer general waste and recycling to the chute hopper available on each residential level. Organics will be taken down to waste room located on Basement 1 for disposal in dedicated FOGO bins.
3. Building management are responsible for maintenance of bins and the waste storage rooms, ensuring bins are clean and in working order. Building management are also responsible for switching out full bins and monitoring bin fullness;
4. Building management is to ensure contracts with a private waste contractor, who also ensure appropriate collection scheduling and access is organised to minimise noise, odour, vermin, and visual amenity impacts to staff, visitors and the public.

The flow of **commercial waste and recycling** goes from generation to collection through several steps:

1. Waste is temporarily stored at its point of generation in an appropriately sized receptacle, clearly marked for type of waste;
2. Building cleaners and staff are to transfer waste to the commercial waste storage room for appropriate disposal into the respective bin.
3. Cleaning staff and building management are responsible for maintenance of bins and the waste storage rooms, ensuring bins are clean and in working order. Cleaning staff and Building management are also responsible for switching out full bins and monitoring bin fullness;
4. Building management is to ensure contracts with a private waste contractor, who also ensure appropriate collection scheduling and access is organised to minimise noise, odour, vermin, and visual amenity impacts to staff, visitors and the public.

4.4 Management System and Responsibilities

The building manager will be responsible for the management of waste at the site. Should there be any issues that impact on the operational efficiency, safety and suitability of waste management, management will be responsible for making any necessary changes, responsibilities include:

- Using this WMP to inform waste management operations, design and infrastructure;
- Providing educational materials and information on sorting methods for recycled waste, awareness of waste management procedures for waste minimisation and resource recovery;
- Maintaining a valid and current contract with a licensed waste service provider for waste and recycling collection and disposal;
- Making information available to residents and visitors about waste management procedures;
- Organising, maintaining and cleaning bins as part of a regular maintenance schedule;
- Manoeuvring bins to specified onsite collection point prior to and following scheduled collection of waste bins;
- Organising bulky waste collections as required;
- Ensuring bin allocation and waste/recycling collection frequency is adequate. Requesting additional infrastructure or services where necessary; and
- Monitoring any vermin and pest issues and arranging appropriate controls (traps or fumigating) and maintenance of doors or other points of potential entry.

4.5 Collection Method and Loading Areas

A private waste contractor (Waste Clear) is proposed to service both the residential and non-residential components of the development, as the basement design and clearance heights cannot accommodate Council's collection vehicle due to its specifications:

- Length – 10.13m;
- Height clearance – 3.374m;
- Width – 2.5m; and
- Wheelbase – 5.175m.

A letter of confirmation has been acquired from Waste Clear that the site can be serviced by their Small Rigid Vehicle (SRV) mini rear loaders with the following specifications:

- Length – 6.4m;
- Height clearance – 2.08m; and
- Width – 1.7m.

The waste collection vehicle will enter the site in a forward direction from Shadforth Street. The proposed waste loading zone is located on the eastern side of the basement level, with the residential and commercial bin rooms opening directly onto this collection area. This allows the bins to be conveniently presented for servicing.

The waste collection vehicle will need to perform a short three-point turn into the loading zone and exit the basement in a forward-facing direction. Additionally, the loading zone is located away from any parking spaces and from basement lift lobbies which reduces pedestrian and traffic during collection.

Continuous forward movement for waste collection cannot be reasonably accommodated due to the placement of plant and service rooms in Basement 1, which obstruct internal circulation. Furthermore, the configuration of the structural cores limits the turning radii, causing forward-only truck movements unfeasible without significant redesign.

Table 8: Collection points and loading areas requirements and specification

Component	Requirement	Specification
Collection point	Allow safe waste collection and loading operations	- Adequate clearance and manoeuvring space; - Sufficient clearance for the safe handling of materials and equipment; and - Sectioned loading zone does not impede upon traffic and pedestrian safety.
Vehicle manoeuvring and loading space	Truck space for adequate lift clearance, manoeuvring and operation for a contractor collection vehicle	- Collection from the loading zone by the proposed mini rear loader; - Adequate loading zone dimensions to not impede lift clearance; - Operational clearance for truck entering and exiting in a forward direction, and the required reverse manoeuvring; and - The provision of space clear of vehicle parking spaces (level and free of obstructions).
Operating times	Appropriate collection times to limit noise and traffic disturbance	- Collection times will be scheduled during daytime off-peak periods and outside the hours of 10:00 pm to 7:00 am to minimise noise and disruption and ensure safety.

4.6 Waste and Recycling Storage Areas

The waste areas will provide centralised storage that has adequate capacity to receive and store the maximum likely generation of waste and recycling between collection times. In accordance with the WDCP 2015, it is recommended the bin storage areas be designed with the following considerations:

- Storage areas reflect the equipment, infrastructure, manoeuvring space and potential future needs of the development;
- Separate Residential and Commercial waste areas will be maintained;
- Be located in a position that is convenient for users and waste collection staff, located away from habitable rooms;

- Waste handling, storage and collection systems for residential and non-residential waste to be separate and self-contained;
- All waste and recycling storage areas and access paths to be kept clean and free of obstructions;
- The floor being graded and drained to an approved drainage outlet connected to the sewer and having a smooth, even surface, coved at all intersections with walls;
- The walls being cement rendered to a smooth, even surface and coved at all intersections; and
- The room shall be adequately ventilated (either natural or mechanical) in accordance with the Building Code of Australia.

4.7 Signage

Signage that promotes resource recovery, waste minimisation, safety and amenity follows the Australian Standard for safety signs for the occupational environment (Standards Australia, 1994).

Signage will be designed to consider language and non-English speaking backgrounds, vision impairment and accessibility. Illustrative graphics must form a minimum 50% of the area of the signage. Signage is to be prominently posted in the waste room indicating:

- Details regarding acceptable recyclables;
- Recyclables are to be decanted loose (not bagged);
- *No standing* and *danger* warnings apply to the area surrounding the waste storage area;
- Contact details for arranging the disposal of bulky items; and
- The area is to be kept tidy.

Standard signage requirements and guidance for application apply (see Appendix C).

4.8 Prevention of Pollution and Litter Reduction

To minimise dispersion of litter and prevent pollution (to water and land via contamination of runoff, dust and hazardous materials), building management and the site cleaning staff will also be responsible for:

- Maintenance of open and common site areas;
- Ensuring waste areas are well maintained and kept clean;
- Securing the waste storage area from vandalism and the escape of litter;
- Identification and appropriate disposal of goods with hazardous material content (paints, e-waste, fluorescent tubes);
- Taking action to prevent dumping and unauthorised use of waste areas; and
- Requiring contractors to clean up any spillage that may occur during waste servicing or other work.

5 Assessment and Findings

The following table presents a summary of the assessment of the proposed operational waste management systems against the relevant general control specified in WDCP 2015 Chapter E5.3 – On-site waste and recycling controls for all development, and relevant site-specific controls listed in Chapter E5.4 – Residential flat buildings, manor houses, multi dwelling housing and multi dwelling housing (terraces) and E5.6 – Commercial and non-residential development.

Table 9: Assessment of proposed operational waste management systems

WDCP Controls	Assessment
E5.3 – On-site waste and recycling controls for all development	
C1 – A SWMMP is submitted with the development application. The SWMMP must identify waste and recycling storage areas by showing on the plans the location and size of: a) Temporary indoor waste and recycling storage space for each dwelling or tenancy; b) Onsite waste and recycling storage areas; c) Individual and/or communal composting; d) Waste collection points; e) Garbage chutes and interim storage facilities for recyclable materials; f) Any service rooms (for accessing a garbage chute) on each floor of the building; g) Waste compaction equipment; h) Waste collection point for collecting and emptying waste, recycling and garden waste bins; and i) The path of travel for moving bins from the storage area to the collection point, demonstrating width, height, grade and accessibility, where the collection point differs from the storage area.	The WMP identifies the following infrastructure relevant to the development on the plans: a) Onsite waste and recycling storage areas; b) Waste collection points; c) Garbage chutes and interim storage facilities for recyclable materials; d) Waste collection point for collecting and emptying waste, recycling and garden waste bins; and e) The path of travel for moving bins from the storage area to the collection point, demonstrating width, height, grade and accessibility, where the collection point differs from the storage area. General waste compaction equipment has not been incorporated as sufficient bins and space can be allocated to manage the estimated weekly volumes. Each dwelling will be provided with sufficient space to store receptacles capable of accommodating at least one day's worth of general waste, recycling, and FOGO waste. Dedicated space for a composting unit has not been formally allocated within the development; however, the communal garden area provides sufficient room to accommodate a small-scale composting system for residential organics, should building management choose to implement one.
C2 – Waste and recycling storage areas are designed so recyclable materials are separated from general waste.	Residential and commercial WSRAs will have separate bins for general waste and recyclables.
C3 – Waste and recycling storage areas are located behind the building line or within non-habitable areas of the building.	All WSRAs are proposed to be located in Basement 1 and thus will not detract from the streetscape.
C4 – Waste and recycling storage areas are integrated with the overall design and do not detract from the streetscape.	

WDCP Controls	Assessment
External materials and finishes must be of similar style and quality to the rest of the development.	The WSRAs will be designed to have the external materials and finishes will be consistent with the rest of the development.
C5 – Waste and recycling storage areas and composting areas must be located so that the facility: a) Is convenient and safely located for occupants; b) Has unobstructed access to the collection point, free of steps and kerbs and with a grade no steeper than 1:8; c) Is secure and designed to minimise opportunities for vandalism; and d) Does not reduce amenity for occupants or adjoining properties by way of visual, noise or odour impacts.	a) All WSRAs are located in Basement 1. Residents will only have access to the combined FOGO and bulky waste room which can be conveniently accessed via the lifts. b) Consolidated waste rooms holding the bins awaiting collection open directly to the loading zone. All the WSRAs and chute rooms are at the same grade and has unobstructed bin transfer pathways. c) and d) The chute rooms and WSRAs are located in the basement, and depending on the room access is limited to the building management, residents and retail tenants, which minimises opportunities for vandalism, and is not expected to reduce amenity from visual, noise or odour impacts.
C6 – Bulk bins, where permitted, must be designed to be manually manoeuvred by one person for servicing.	660L bulk bins will be used, and the maximum manoeuvring distances will be less than 5m which make it suitable to manually manoeuvred by one person
C7 – Waste and recycling collection points do not impact on traffic and pedestrian safety.	The WSRAs open directly onto to the dedicated loading zone, which is sectioned from the vehicle and pedestrian circulation paths within the basement. While minor traffic impacts may occur due to the need for collection vehicles to reverse into the loading zone and subsequently exit in a forward direction, these will be mitigated by scheduling waste collection outside of peak traffic and pedestrian hours to ensure safety and operational efficiency.
C8 – Bins may be collected from a kerbside location where site characteristics, number of bins and street frontage length do not compromise safety.	N/A
C9 – Where kerbside bin collection is not appropriate; bins are collected on site.	On-site collection is proposed.
C10 – Where a collection vehicle is required to enter a property, access driveways and internal roads are designed in accordance with AS 2890.2 <i>Parking Facilities – Off-Street Commercial Vehicle Facilities</i> (2002).	The vehicle will enter the property from Shadforth Street and directly access the basement ramp. This will be designed in accordance with AS 2890.2 <i>Parking Facilities – Off-Street Commercial Vehicle Facilities</i> (2002).

WDCP Controls	Assessment
C11 – Waste and recycling collection points are located to allow collection vehicles to move in a continuous forward movement. Reversing should be avoided as it creates noise (from reverse beeping/alarms) and can also be less safe. If reversing is required the SWMMP accompanying the DA must justify why a continuous forward movement for collection cannot reasonably be accommodated.	The collection will require a short three-point manoeuvre for the truck to enter into the loading zone for servicing the bins. The justification for the reverse manoeuvre is provided in Section 4.5. Additionally, the loading zone is positioned away from parking spaces and basement lift lobbies, reducing risks to both traffic and pedestrian safety. To further minimise potential conflicts, waste collection will be scheduled outside peak traffic and pedestrian periods.
Chapter E5.4 – Residential flat buildings, manor houses, multi dwelling housing and multi dwelling housing (terraces)	
C1 – Each dwelling is provided with an indoor waste and recycling cupboard (or other appropriate storage space) for the interim storage of a minimum one day's garbage and recycling generation.	Each dwelling will be provided with sufficient space to store receptacles capable of accommodating at least one day's worth of general waste, recycling, and FOGO waste. These receptacles may be located under the kitchen benchtop or in another accessible location that has minimal impact to residential amenity in terms of odour or visual appearance.
C2 – For residential flat buildings and manor houses, a communal waste and recycling storage area for housing bins is provided.	Two communal WSRAs are proposed – one will consolidate all the general waste and recycling bins, and the other will consolidate the bulky waste and FOGO bins.
C4 – The size and design of the waste and recycling area or areas accommodate: a) 120L residual waste per dwelling; b) 55L recyclables per dwelling in 120/240L MGBs; c) 240L shared-use MGBs for food and garden organics.	The WSRAs are designed according to the following requirements and is specified in Section 3.2.1, 3.2.3, and 3.2.4.
C5 – An area suitable for on-site composting is provided, either as a communal facility or an area for each dwelling.	Sufficient space is available within the communal garden to accommodate a small-scale composting system for residential organics if pursued by building management.
C6 – Development containing 20 or more dwellings provides a garbage compaction unit.	While the proposed development has more than 20 units, based on correspondence with Council, it is understood that a compaction unit is not a necessary requirement.
C7 – Bulk waste bins are not encouraged and should only be considered for developments containing 12 or more dwellings.	Since 40 dwellings are proposed, bulk bins are a suitable option.
C8 – Communal waste and recycling storage rooms should generally be located in a basement within the main building envelope. Standalone rooms must comply with CPTED principles.	All WSRAs are located in the basement within the main building envelope.

WDCP Controls	Assessment
C9 – Developments of four or more storeys provide a suitable system for transporting waste and recyclables from each storey to the waste storage and collection areas, e.g. a garbage chute.	A single chute system with an e-diverter will be provisioned to manage residential general waste and recycling waste.
C10 – Developments containing 10 or more dwellings provide a dedicated room or caged area for temporary storage of bulky waste awaiting removal, easily accessible and located near the main waste storage area.	A separate room for bulky waste and FOGO bins will be provisioned for the temporary storage of bulky waste awaiting removal. It will be easily accessible and located near the main waste storage area.
C11 – The travel distance from the waste and recycling storage area to the collection point is not more than 75 m (50 m for SEPP Seniors developments).	The travel distance from the WSRAs to the collection point will not more than 75m.
C12 – Collection and storage facilities must provide an unobstructed accessible path of travel (per AS 1428) to: a) the entry of any adaptable housing; b) the principal entrance to each residential flat building and manor house; and c) the point at which bins are emptied and collected.	The location of the waste storage rooms accessible by residents (only the bulky waste and FOGO room) and collection point (the loading zone) will be designed to have an unobstructed accessible path of travel per AS 1428.
E5.6 – Commercial and non-residential development	
C1 – A waste and recycling cupboard is provided for each individual kitchen area in the development, including kitchen areas in hotel rooms, motel rooms and staff food preparation areas.	No food retail uses are proposed.
C2 – Each waste and recycling cupboard is designed to hold a minimum of one day's waste and keep general waste separated from recyclable materials.	Interim containers within retail areas will be available sufficient for one day's generation of at least general waste and recycling.
C3 – A goods lift may be included in multiple storey buildings.	N/A
C4 – The size of the waste and recycling storage area or areas is designed to accommodate the rates of waste generation and recyclable material generation identified in Table 1 below.	Commercial WSRA requirements have been modelled based on the waste generation rates from Table 1 of Chapter E5.6.
C5 – Bulk waste bins are not encouraged and should only be considered for developments containing 12 or more tenancies.	240L bin sizes are proposed.
C6 – Waste and recycling containers should be collected from a rear lane access point, where possible.	Waste receptacles will be collected from the loading zone in Basement 1.
C7 – The SWMMP submitted with the development application must include: a) the location of glass and recycling collection and sorting areas, which are to be shown on the DA plans. Note the installation of a glass crushing machine is encouraged to minimise noise from glass sorting.	a) Separate bins for co-mingled recycling and paper and cardboard will be provided to encourage separation of waste streams. Retail shop uses are not expected to generate large quantities of glass, so a glass crushing machine is not required. b) Waste management and collection procedures for the overall development are outlined in

WDCP Controls	Assessment
b) the waste management operating procedures, including the collection times. These must minimise noise and disturbances to residential amenity, especially between 10pm and 7am.	Section 4.3, 4.4 and 4.5. To minimise noise and disturbances to residential amenity, the waste collection will be organised during off-peak times during the day.

6 Mitigation Measures

This report concludes that the proposed development complies with most of the waste management controls specified in the WDCP 2015 and warrants approval subject to implementation of the following mitigation measures:

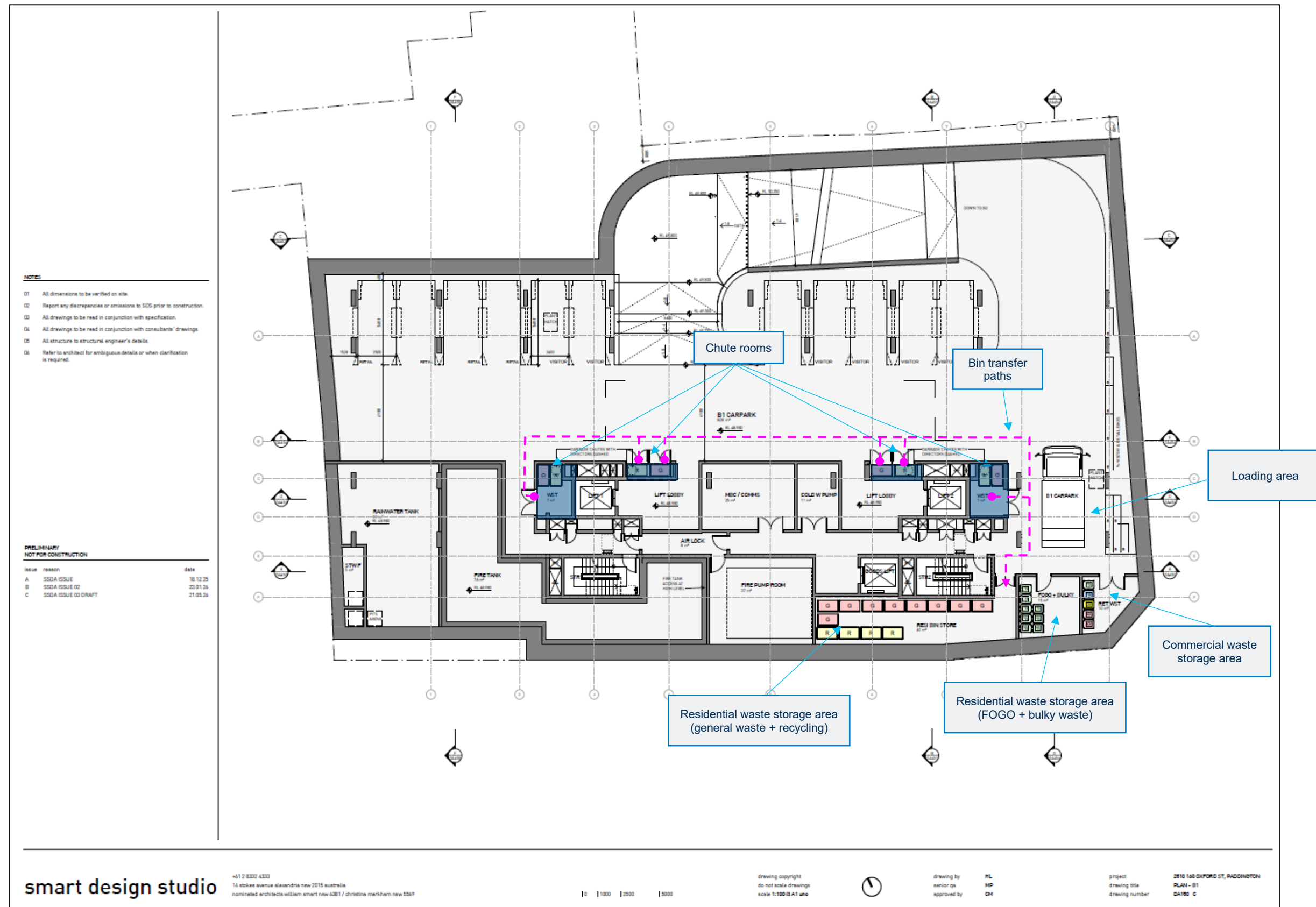
- A private waste service provider (Waste Clear) will be engaged to collect all waste streams from both the residential and non-residential components of the development, with collections undertaken weekly and up to twice weekly, respectively.
- The bin collection point (loading zone) and access driveways will be designed in accordance with AS 2890.2 *Parking Facilities – Off-Street Commercial Vehicle Facilities (2002)* to accommodate the specifications of the nominated collection vehicle (a SRV mini rear loader).
- Waste collection vehicles will be required to perform a short three-point reverse into the designated loading zone for servicing. A justification for this arrangement is provided in Section 4.5. Although minor traffic impacts may occur due to reversing movements, these will be mitigated by restricting waste collection to off-peak hours, reducing interactions with both vehicle and pedestrian traffic to maintain safety and operational efficiency.
- To protect residential amenity, waste collection will be scheduled during daytime off-peak periods and outside the hours of 10:00 pm to 7:00 am to minimise noise and disruption.
- Dedicated space for a composting unit has not been formally allocated within the development; however, the communal garden area provides sufficient room to accommodate a small-scale composting system for residential organics, should building management choose to implement one.

7 References

- Australian Department of Sustainability, Environment Water, Population and Communities (2011) Construction and Demolition Waste Guide - Recycling and Re-use Across the Supply Chain.
- Australian Standards 4123.7 Mobile Waste Containers.
- Green Building Council of Australia (2021) Construction & demolition waste reporting criteria
- NSW EPA (2012) Better Practice Guidelines for Waste Management and Recycling in Commercial and Industrial Facilities.
- NSW EPA (2013) NSW Waste Avoidance and Resource Recovery Strategy 2014-2021
- NSW EPA (2014) Waste Classification Guidelines.
- NSW EPA (2016) Recycling Signs, Posters and Symbols. Available at: <http://www.epa.nsw.gov.au/wastetools/signs-posters-symbols.htm>.
- NSW EPA (2019) Better Practice Guide for Resource Recovery in Residential Developments.
- NSW Government (1979) Environmental Planning and Assessment Act.
- NSW Government (1997) Protection of the Environment Operations Act.
- NSW Government (2000) Environmental Planning and Assessment Regulation.
- NSW Government (2001) The Waste Avoidance and Resource Recovery Act.
- Woollahra Development Control Plan 2015
- Woollahra Local Environmental Plan 2014

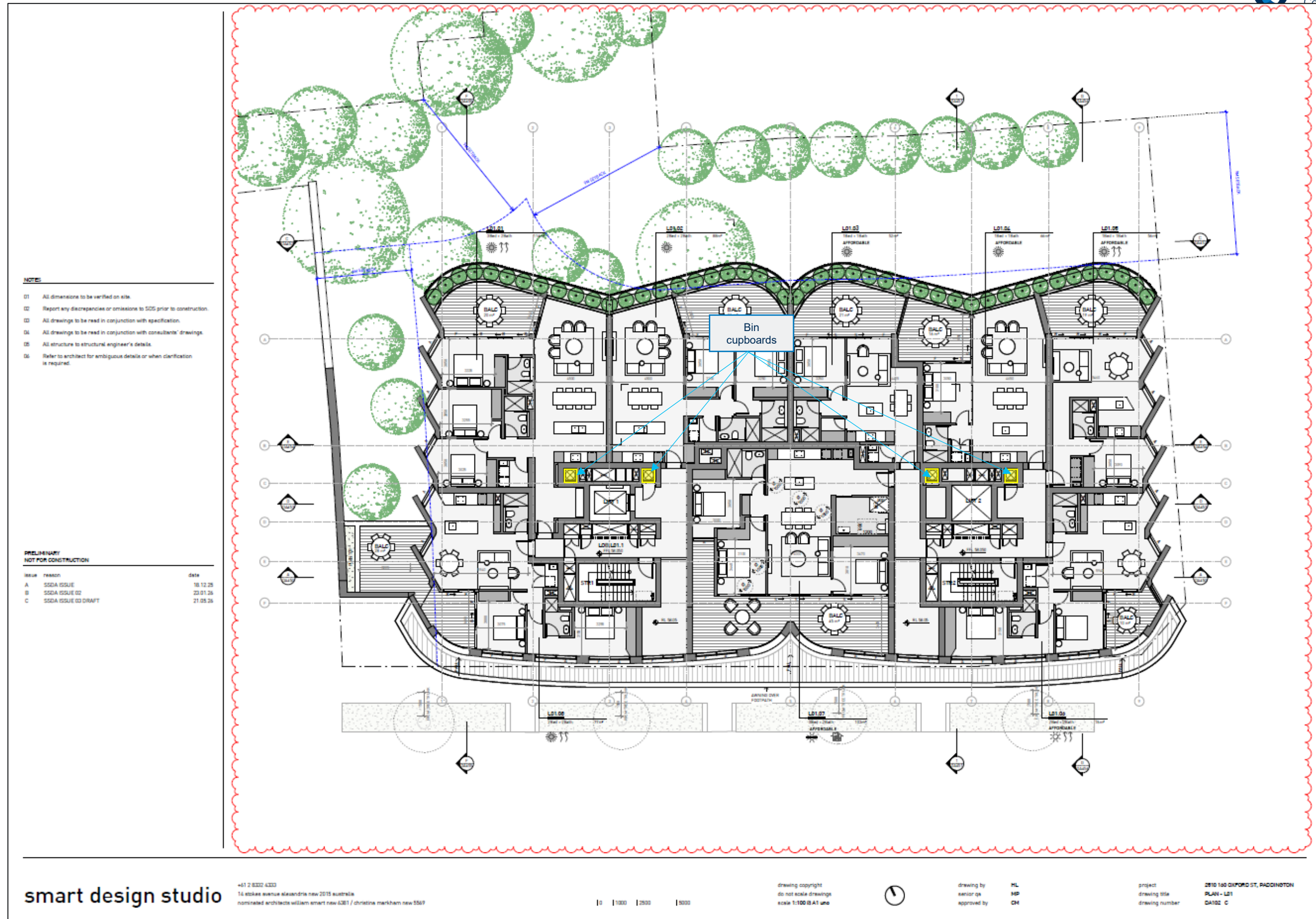
Appendix A Proposed Site Plans

Figure 2: Proposed basement plan



Source: Smart Design Studio, 2026.

Figure 3: Proposed residential level - Level 01



Source: Smart Design Studio, 2026.

Appendix B FOGO Recycling Bill Summary 2025

FOGO Recycling Bill 2025

Information for Businesses



Key requirements

Relevant premises must:

- Have a food organics (FO) waste collection service in place by the relevant deadline
- Ensure collection of FO waste at least once weekly
- Ensure FO waste is not mixed with non-organic waste during collection and transportation

Relevant premises include:

- Supermarkets
- Shopping centre food courts
- Centre-based childcare facilities
- Correctional complexes (including correctional centres)
- Education establishments
- Food & drink premises
- Hospitals
- Registered clubs
- Premises used for a mobile catering business
- Seniors housing without a regular council waste collection service
- Residential accommodation that receives a regular waste collection service by someone *other than a council*



Timeline



1 July 2026

Businesses with weekly residual waste capacity of:

- ≥ 3,840L
- 6 x 660L bins
- 16 x 240L bins



1 July 2028

Businesses with weekly residual waste capacity of:

- ≥ 1,920L
- 3 x 660L bins
- 8 x 240L bins



1 July 2030

Businesses **and** residential accommodations with weekly residual waste capacity of:

- ≥ 660L
- 1 x 660L bins
- 3 x 240L bins



Exemptions

The FOGO Recycling Bill does NOT apply to:

- Relevant premises with < 720L of weekly residual waste capacity (1 x 660L or 3 x 240L bins)



Residential accommodations includes those with a regular **COMMERCIAL** residual waste collection service

Source: MRA Consulting Group, 2025.

FOGO Recycling Bill 2025

Information for Councils





Key Requirements

By 1 July 2030
Local councils must:

- ☒ Provide all households with a food organics and garden organics (FOGO) waste service (either a FOGO bin or separate FO and GO bins)
- ☒ Provide weekly household collection of FOGO waste
- ☒ Ensure FOGO waste is not mixed with non-organic waste during collection



Regulations

A FOGO Implementation Advisory Panel will be established to:

- Provide advice to the Minister and EPA about implementation of this mandate
- Be consulted about matters to be prescribed in regulations regarding this mandate

Exemptions

The FOGO 2025 mandate does NOT apply to:

- Households not provided with a residual waste (red bin) collection service by their local council
- Lord Howe Island
- Parts of the Western Division not within the area of a local council

The EPA will develop an exemption framework which will consider:

- Geographical or population constraints
- Availability of infrastructure
- Timing and expiration of waste contracts
- Infrastructure impairments of multi-unit dwellings (MUDS) e.g., bin chutes



Source: MRA Consulting Group, 2025.

Appendix C Standard Signage

Waste Signage

Signs for garbage, recycling and organics bins should comply with the standard signs promoted by the NSW EPA.

Standard symbols for use in signage, bin facade and educational materials are promoted through the NSW Environment Protection Authority. They are available for download from the NSW EPA website (NSW EPA 2016b), in black and white and colour versions. The Australian Standard series AS 4123 (Part 7) details colours for mobile waste containers (Standards Australia 2008).

Figure 4: Examples of standard signage for bin uses



Safety Signs

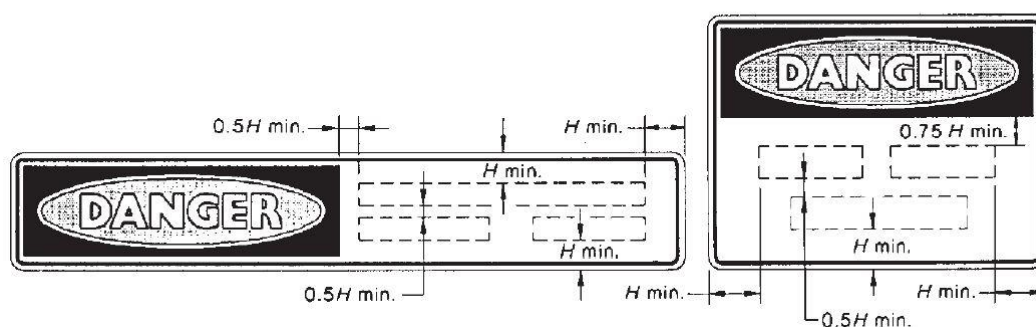
The design and use of safety signs for waste and recycling rooms and enclosures should comply with AS 1319 (Standards Australia 1994). Safety signs should be used to regulate, and control safety related to behaviour, warn of hazards and provide emergency information, including fire protection information. Below are some examples. Clear and easy to read 'NO STANDING' and 'DANGER' warning signs must be fixed to the external face of each waste and recycling room where appropriate.

Figure 5: Example and layout of safety signage



(d) Horizontal

FIGURE D5 TYPICAL ARRANGEMENTS OF DANGER SIGNS



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