

29 June 2026

SLR Ref No.: 610.30495-L02-v2.0-20260629.docx

Attention: Marc Yeo
Time & Place
Level 34, Suite 3402
Australia Square
264 George Street,
Sydney NSW 2000

SLR Project No.: 610.30495

Client Reference: 45-53 Macleay Street

**RE: 45-53 Macleay Street, Potts Point
Council and Urbis Comments Addressed**

1.0 Introduction

In January 2026, SLR Consulting completed a waste management plan on behalf of T&P Chimes Development Pty Ltd to accompany a state significant development application for a 16-storey mixed use development at 45-53 Macleay Street, Potts Point. The development comprises 44 apartments and ground floor retail.

This WMP was prepared in response to the requirements in the SEARs dated 16 May 2025 issued for SSD-83867719.

The City of Sydney reviewed the waste management plan and, in a letter dated 30 April 2026, provided some comments on the proposed waste management system. In addition, Urbis reviewed the waste management plan and provided comments. These changes have been accommodated in an updated waste management plan, SLR reference 610.30495-R01-v12.0-20260623.

This letter responds to each of Council's and Urbis' comments and indicates where in the waste management plan changes were made, if changes were necessary, or why changes are not proposed to be made.

2.0 Council Comments

Council's comments are shown below in italics with the response following in each case.

2.1 Bulky Waste

The bulky waste and problem waste storage area must be designed in accordance with Section B.2.2 of the Guidelines

Section B.2.2 requires a lockable cage, designated screened area or room in or attached to the storage area dedicated for bulky waste and problem waste.

New drawings have been prepared that show retail and residential bulky waste areas that comply with these requirements. These are shown in Figure 1 below.

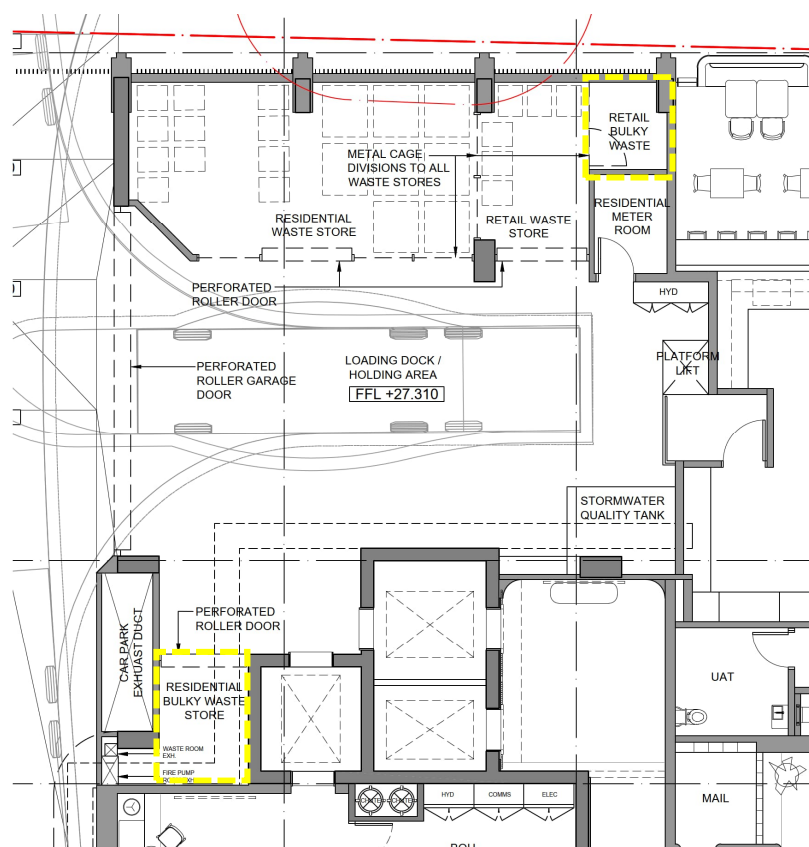


Figure 1 Bulky waste storage areas

2.2 Calculating waste quantities

The volume of waste must be calculated as per Reference A of the Guidelines, with bin allocation for each stream to be rounded up to the next whole number to ensure sufficient capacity.

Reference A sets out waste generation rates to be used for residential and retail premises.

2.2.1 Residential

The table on the first page of Reference A, page 32 of the Guidelines, states that for multi-residential developments, 120 L of garbage and 120 L of recyclables should be allowed per week. An allowance of 120 L for garden organics can be made but this *Only applies to multi-residential dwellings that generate garden organics (e.g. garden prunings and leaves)* which is not the case in this development.

Section 8.2.1 Residential in the waste management plan clearly states that *Council requires that each apartment has 120 L of garbage capacity and 120 L of recycling capacity each week*. Multiplying 44 units by 120 L gives 5,280 L for garbage and 5,280 L of recycling per week. In the absence of advice in the Guidelines on how much food waste to allow for, SLR has assumed that 50% of the garbage stream will be food waste and has therefore, divided the garbage quantities into two, 2,640 L for garbage and 2,640 L for food.

If collected once per week, this amounts to 2.4 1100 L bins for garbage, 4.8 for recycling and 11.0 240 L bins for food. These have been rounded up as specified by Council, to provide three bins for garbage, five for recycling and 11 for food waste. This is explained in the



waste plan in Section 8.2.1 Residential and shown in Table 11 Residential waste space allowance.

2.2.2 Retail

The table on the second page of Reference A, page 33 of the Guidelines, shows a list of non-residential development types and the proposed waste generation rates for each. A café is proposed on the ground floor of the development so SLR has used the figures for *Restaurant / eating* in the table on page 33 which says that 100 L of garbage, 500 L of recycling and 100 L of food waste per 100 m² per day of floor space should be assumed.

With a floor area of 121 m², the amount of garbage generated per day is 121 L, the amount of recycling is 605 L and the amount of food waste is 121 L. Multiplying these figures by seven, the number of days the café will be open each week, gives the figures shown in Table 12

Retail waste space allowance in the waste management plan. These amounts are 847 L of garbage, 4,235 L of recycling and 847 L of food waste.

If collected five days per week, this amounts to 0.71 240 L bins for garbage, 3.53 for recycling and 0.71 for food waste. These have been rounded up as specified by Council, to provide one bin for garbage, four for recycling and one for food waste. This is explained in the waste plan in Section 8.3.2 Retail and shown in Table 12 Retail waste space allowance.

For both residential and retail elements of the development, waste quantities have been calculated using the waste generation rates in Reference A.

2.3 Weekly collection frequency

The number of bins and associated storage area for the non-residential component must be recalculated and provided on the basis of no more than 3 times per week to align with the NSW Waste and Sustainable Materials Strategy

As the once per week collection frequencies proposed for residential collections already comply with this requirement, it is assumed that the retail collections, proposed to be five times per week, are the issue.

The purpose of the NSW Waste and Sustainable Materials Strategy 2041 is to guide how NSW manages waste over the long term and transition the state toward a circular economy. It is a whole-of-state policy and does not regulate individual projects such as this. New developments are regulated by planning laws and development control plans.

As expected therefore, the NSW Waste Strategy makes no mention of waste collection frequencies in new developments.

In addition, neither of the instruments that more directly affect new developments in the City of Sydney, the Sydney DCP and the Guidelines for Waste Management in New Developments, make any requirements for waste collection frequencies, let alone specifying three times per week.

No changes are required therefore, for the proposed retail collection frequencies.

2.4 Separate residential and non-residential waste storage

The proposed development must ensure that waste and recycling systems for the residential (residential) and non-residential (Commercial/Retail) components are entirely separate and self-contained in accordance with Section E.1.1 of the Guidelines



The design of the development has been amended to allow for separate and secured residential and retail waste storage areas. These are shown in Figure 2 below.

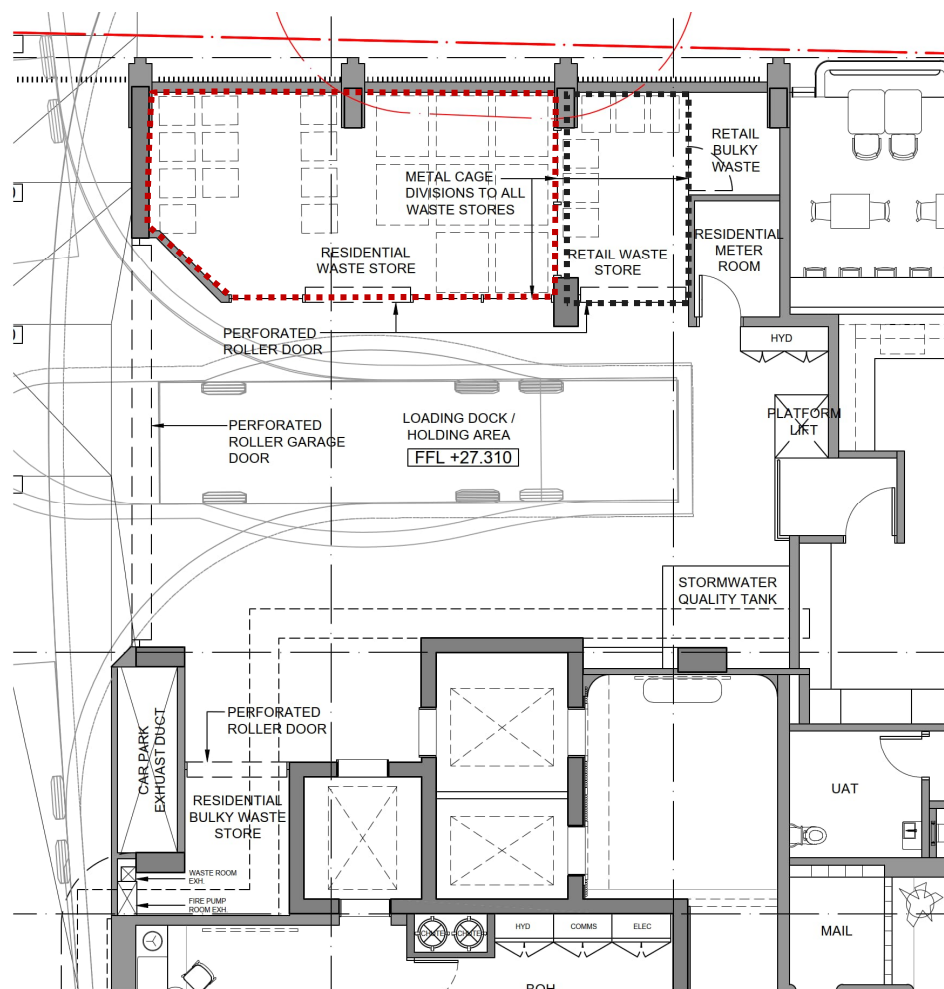


Figure 2 Retail and residential waste storage areas

2.5 Waste transfer within the development

All waste transfer must be completed wholly within the development, without relying on the public domain

The design of the development has been amended to allow access to the loading dock from within the retail tenancy. No waste transfer across public areas is proposed. This is shown in Figure 3 below.



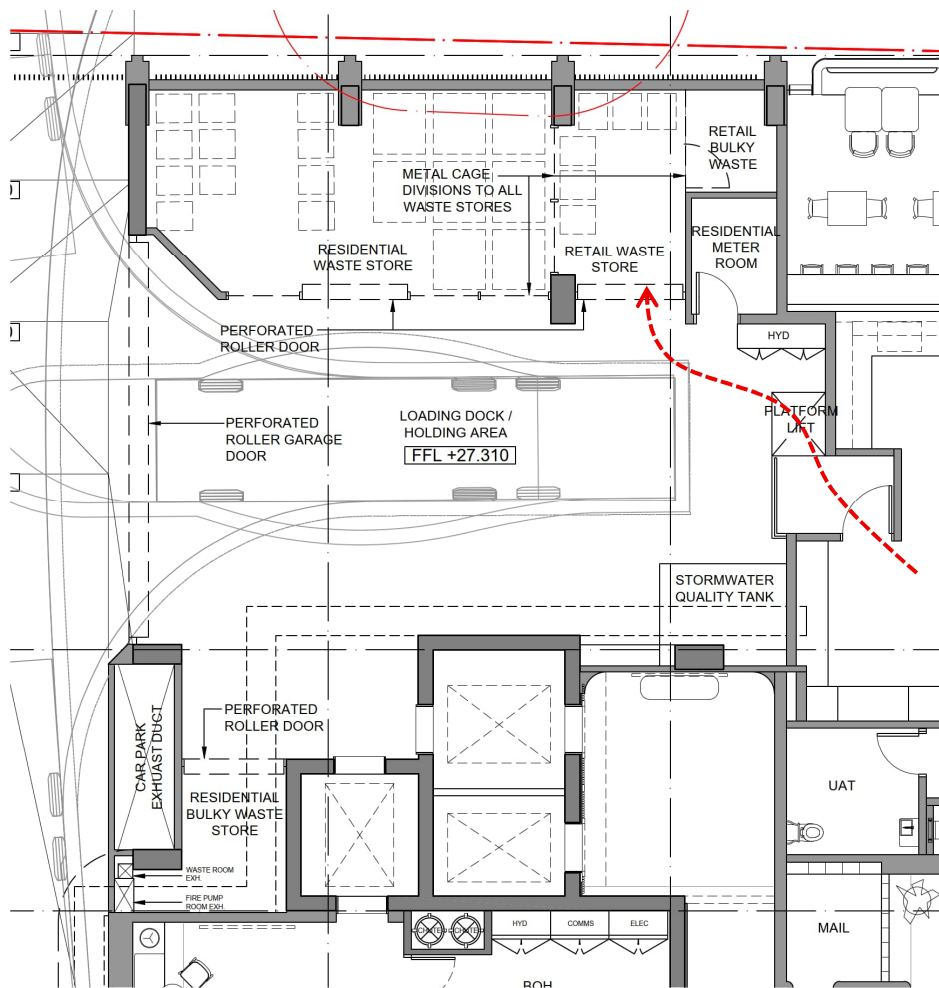


Figure 3 Retail access to loading dock

2.6 Chutes

The use of a single e-diverter chute system for the residential component is not supported as it has a high contamination rate. A dual-chute system must be provided to facilitate intuitive source separation.

The design of the development has been amended to allow for two chutes to be installed, one for garbage and one for recyclables. This is shown in Figure 4 below.



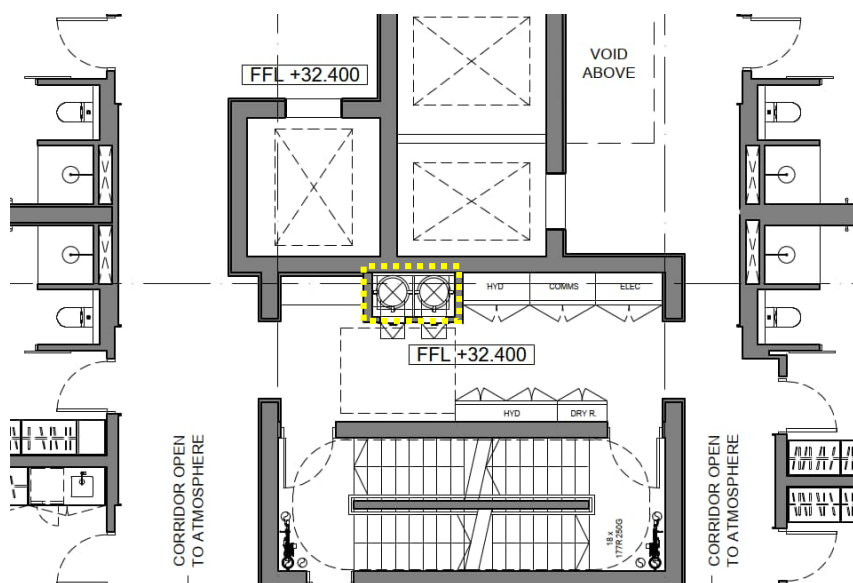


Figure 4 Dual chutes

2.7 FOGO disposal

FOGO disposal points should be provided on every residential level as per Section B.4.1 as the current proposal requires residents to carry food waste to a centralised location in the basement, which exceeds the maximum allowable travel distance of 30 m from the unit entrances.

Section B 4.1 says that *A chute room is required on each habitable floor of a development that has a chute system.* The development already complies with this requirement as shown in Figure 5 below

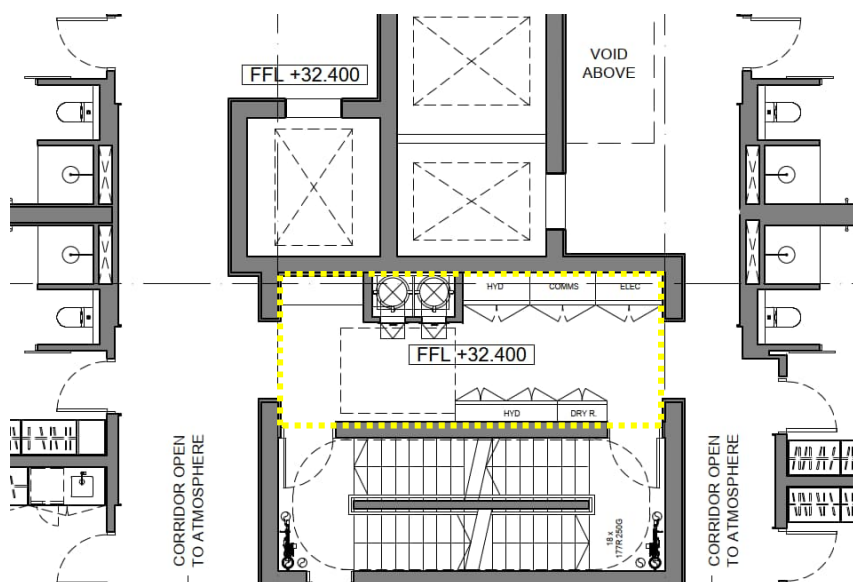


Figure 5 Chute room



In regard to the requirement to carry food waste, there is no requirement in the DCP or Waste Guidelines for food waste to be separated at all. The table in Reference A says that the waste allowance for food waste in MUDs is 'N/a'.

Despite that, and with regard to the NSW Government Food Waste Mandate, a FOGO room has been provided on a basement level, and a FOGO disposal point will be provided on Levels 1 and 2. These will be serviced and managed by the building manager or affordable housing provider. The distance from the furthest residential door to the FOGO disposal point is 19 m which is well within the 30 m requirement.

2.8 Waste room layout

The waste room layout must be amended in accordance with Reference D of the Guidelines, ensuring the layout allows the safe handling and restricted access.

Reference D of the Guidelines sets out construction requirements for waste storage.

The waste storage rooms comply on each point:

1.1 The floors, walls and ceilings of waste and recycling storage areas and chute room(s) are to be finished with a rigid, smooth-faced impermeable material capable of being easily cleaned.

The floors, walls and ceilings of waste and recycling storage areas and chute rooms will be finished with a rigid, smooth-faced impermeable material capable of being easily cleaned

1.2 The floors of waste and recycling storage areas are to be graded and drained to a Sydney Water approved drainage fitting. The floor is to be provided with a ramp to the doorway where necessary.

The waste storage areas will have an approved Sydney Water floor waste drain. This will be shown in the hydraulic plans in design development after DA approval. No ramp is required.

1.3 A close-fitting and self-closing door or gate operable from within the room is to be fitted to all waste and recycling storage areas.

Perforated roller doors are proposed.

1.4 Doors/gates to the waste and recycling storage rooms are to provide a minimum clearance width of 900 mm.

The minimum clearance for all waste storage doors is at least 900 mm.

1.5 At least one door or gate to the waste and recycling storage area is to have sufficient dimensions to allow the entry and exit of waste containers of a capacity nominated for the development.

The doors to the waste storage areas are wide enough to allow the entry of all proposed waste containers.

1.6 Lightweight roller shutter-type doors or grilles should be considered for access to waste and recycling storage areas, as these do not impact on the available storage space. If these types of doors or grilles are used, the requirement for a close-fitting and self-closing door remains, so that waste collectors can access the waste and recycling storage area other than through the roller door or grille.



Perforated roller doors are proposed.

1.7 The design shall restrict the entry of trespassers, vermin or other animals into the area.

The roller doors to the waste areas and the roller door to the loading dock will be locked and allow access only by residents, retailers, cleaners, Council collection staff and waste contractors.

1.8 The waste and recycling storage area is to be provided with an adequate supply of water for cleaning purposes with a hose cock. This does not include within chute rooms.

A water supply is provided to the waste storage areas.

1.9 The waste and recycling storage area is to be adequately ventilated by either:

1.9.1 Natural ventilation openings to external air. The dimension of the openings are not to be less than 5 per cent of the bin bay or bin room floor area.

1.9.2 A mechanical exhaust ventilation system in accordance with relevant Australian standards.

A mechanical exhaust ventilation system in accordance with relevant Australian standards will be provided

1.10 Waste and recycling areas are to be provided with artificial light controlled by switches located both outside and inside the storage area.

The waste storage areas have lights with switches inside and outside each area.

1.11 Any compactors or mechanical devices, if permitted for the mechanical handling and storage of waste and recycling, are to be fitted with safety operating and cut-off systems.

No compactors or mechanical devices are proposed.

1.12 Any facet of the waste and recycling management system that is visible from outside the building is to be in keeping with the dominant design of the remainder of the development.

No part of the waste system or waste storage is visible from outside the development.

A refrigerated waste room is not proposed.

3.0 Urbis Comments

3.1 DPHI key issues

Urbis suggested DPHI's key issues letter be referenced in the WMP. This has been done in Section 3 DPHI Key Issues.

3.2 Clarification of FOGO collection points

Urbis suggested that discrepancies in where FOGO disposal points are located should be clarified.



The location of the FOGO collection points is described in Section 9.4.1 Residential, which states *Residents on Levels 1 and 2 will take their food waste to a FOGO disposal point on each floor.* The location is shown in Figure 4.

This Section also states that *The distance from the furthest residential door to the FOGO disposal point 19 m which is well within the 30 m requirement. Residents on other floors will take their food waste to the FOGO bin rooms on Basement 2 or Basement 3. (The basement location is shown in Figure 5.) The furthest any resident will have to walk to dispose of food waste is 2 m from the lift to the FOGO room.*

Regards,

SLR Consulting Australia Pty Ltd



Andrew Quinn

Technical Director – Sustainable Waste Management
aquinn@hotmail.com

