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TOGA
Level 5
45 Jones Street
Ultimo NSW 2007

Attention: David Springford

TOGA Central Block C Response to Waste Management Issues Raised by City of Sydney

1 Introduction

SLR is one of Australia's leading waste management consultancies. Our consultants have prepared many waste management plans for new developments including a number in the City of Sydney (the City). Often the waste management plans we have prepared are for large, complex developments with particular issues such as space and access constraints.

SLR was engaged by TOGA to provide waste management advice and prepare a waste management plan for the TOGA Central Block C development, a mixed-use redevelopment proposed for Lee Street, Haymarket and a major element in the Western Gateway sub-precinct at the Central Precinct. SLR had previously provided waste management advice to TOGA for the Surry Hills Shopping Village development and Darlinghurst Collective development, both of which are also in the City of Sydney.

SLR prepared a waste management plan for the TOGA Central development as required by the City. The waste management plan was prepared in accordance with the City's Guidelines for Waste Management in New Developments 2018.

2 The City's RFIs

On 30 September 2022, the City issued Advice on Environmental Impact Statement – Toga Central – SSD-33258337 to TOGA. Section 7 of this document relates to waste management. The issues raised and the responses to them are detailed below.

2.1 7.1 Waste storage arrangements

2.1.1 Issue

As an A-grade state significant development, it is expected that the waste storage arrangements of the development demonstrate top tier performance and shows more foresight than what is currently proposed. Further consideration should be given to future-proof the building for improved resource recovery such as onsite organics processing. To achieve optimal resource recovery, space should also be provided for additional waste streams, such as soft plastics, to be stored in the waste storage area.

2.1.2 Recommendations

The Architectural plans are to clearly show the proposed layout of bins within storage areas with the bins correctly scaled, distinguishing between sizes (eg 240L, 660L, 1100L).

Additional design considerations should be shown on the plans in relation to:

- Ensuring adequate door width for the size of the bins; and

Identify space dedicated for storing bulky waste and problem waste for recycling (see Guidelines for Waste Management in New Developments 2018 for minimum requirements).

2.2 Response

The most recent plans, BSMART-AR-DAD-10B03000[2] General Arrangement Plan Basement Level 03, show separate waste storage areas for retail, commercial and hotel waste. The drawings also show space allocations and a possible layout for the proposed number of bins of different capacities as well as balers for cardboard and plastics, food waste dehydrators, crushed glass bins, cooking oil, cardboard and soft plastics storage. See Figure 1 below.

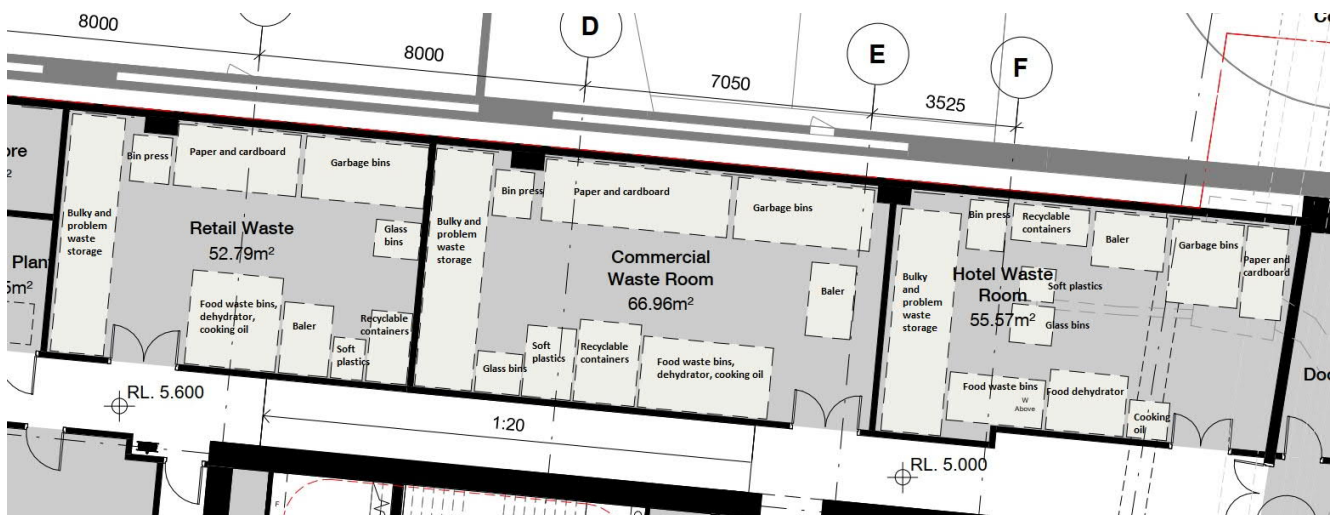


Figure 1 - Waste room layouts

Ultimately it will be a decision for the tenants and/or facilities manager precisely what elements of the waste system will be installed and used, however, it is clear that there is enough space in the waste rooms to accommodate a reasonable range of waste management system options.

The same is the case for the number and capacity of bins. The waste management plan prepared for the development clearly shows, in Table 13 - Hotel waste quantities, bin numbers and waste storage space and Table 14 - Commercial and retail waste quantities, bin numbers and waste storage space, the numbers of 240 L and 1100 L bins proposed. Their precise location and arrangement in the waste rooms are matters for the tenants, cleaners and facilities managers.

The drawings also show that the doorway entrances to each waste room have a width of about 1.5 m, which is wide enough for any of the proposed bins to pass through.

The most recent plans also show storage space for bulky and problem waste, see Figure 1 above, which have been calculated using the formula specified in the City's Guidelines.

2.3 7.2 Waste collection

2.3.1 Issue

The Waste Management Plan submitted should be far more sophisticated and sustainable than requiring seven day a week collection. Seven day a week collection for four waste streams equates to 28 traffic movements per week in the relatively tight loading dock. It is not clear to what extent this was considered when preparing the traffic report.

2.3.2 Recommendation

Space must be provided to store two days generation of all streams. As part of Sustainable Sydney 2030-2050 plan, the City is limiting truck movements to ease road congestion. As such, waste collections should ideally be limited to a maximum 3 x weekly for all waste streams.

2.4 Response

The City's Guidelines for Waste Management in New Developments do not specify a minimum of three collections per week nor do they specify any particular waste collection frequencies. In fact, the Guidelines say that where more than 50 L per day of seafood, poultry or meat are generated, or 20% of these by volume, then collection should be daily.

Based on waste generation rates for retail premises published in the City's Guidelines, SLR has calculated that about 2000 L of food could be generated each day from the hotel, and about 2,900 L from retail and commercial tenants. Ultimately, it will be a matter for the tenants, cleaners and faculties managers to decide whether a food waste collection or on-site food processing system is used. However, storing this quantity of food on site for several days at a time increases the risk of odour and vermin. If a food waste collection is chosen, a daily collection is, therefore, reasonable.

SLR understands that the basement footprint is highly constrained by existing Sydney Water pipes, the existing heritage building and the site boundary. These constraints prohibit substantially larger waste storage areas.

Daily collection of waste and recycling in general is not at all unusual and is not inconsistent with the City's Guidelines for Waste Management in New Developments.

Sustainable Sydney 2030—2050 Continuing the Vision, makes no reference to waste collection frequencies or even heavy vehicle movements. A range of Council's other Sustainable Sydney 2030 documents were also reviewed and while there are references to managing waste collection movements to improve residential amenity and reduce disruption to the community, these relate to the City's own services. There is nothing in any of the documents to say that the City will, or even can, specify the number of private waste collections that should be provided in any street or for any property. There are no specifications for the number of collections that are required nor are there any requirements that no more than three collections be undertaken per week.

2.5 7.3 Interim waste storage areas

2.5.1 Issue

A bin for each waste stream (waste, recycling and food waste) is to be centrally located on each commercial office and hotel floor (clearly mark on the plans). Details on the changeover/servicing and maintenance of these bins is to be outlined within the waste management plan.

2.5.2 Recommendation

Additional design considerations should be shown on the plans in relation to:

- Back of house requirements for the location and storage of additional waste storage and waste handling equipment to be used, e.g. glass crushers, compactors, balers, tugs/trolleys, glass crushers and any other equipment.

2.6 Response

The base building design does not preclude the possibility of interim waste storage areas however, details of how tenants and occupants will operate their own waste management systems, what bins or other waste infrastructure might be required, where it will be located and how much space it might occupy in each tenancy, is a matter for tenants and we expect that this would be developed and decided during internal design stages and fit out operations. It is not known at this time.

3 Summary

- The most recent plans show space allocations and a possible layout for a range of bins, equipment and storage space.
- Ultimately it will be a decision for the tenants and/or facilities manager precisely what elements of the waste system will be installed
- There is enough space in the waste rooms to accommodate a reasonable range of waste management system options.
- The precise location and arrangements of bins and equipment in the waste rooms are matters for the tenants, cleaners and facilities managers.
- The doorway entrances to each waste room are wide enough for any of the proposed bins to pass through.
- The most recent plans show storage space for bulky and problem waste which has been calculated using the formula specified in the City's Guidelines.
- Ultimately, it will be a matter for the tenants, cleaners and faculties managers to decide whether a food waste collection or an on-site food processing system is used
- A daily collection of waste and recycling, if chosen, is not at all unusual and is not inconsistent with the City's Guidelines for Waste Management in New Developments.
- Sustainable Sydney 2030—2050 Continuing the Vision makes no reference to waste collection frequencies or heavy vehicle movements. The City's other sustainability documentation only refers to waste collection movements for its own services, not private waste collections.

- Details of waste systems and equipment used by tenants and occupants will be developed during internal design stages and fit out operations and is currently not known.

Yours sincerely



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Authorised by: DB