

8th September 2025

RE: Response to Request for Information – 3-5 Help St Chatswood

To whom this may concern,

The purpose of this letter is to address the waste items in the Request For Information for the state significant development application for the proposed development at 3-5 Help St Chatswood.

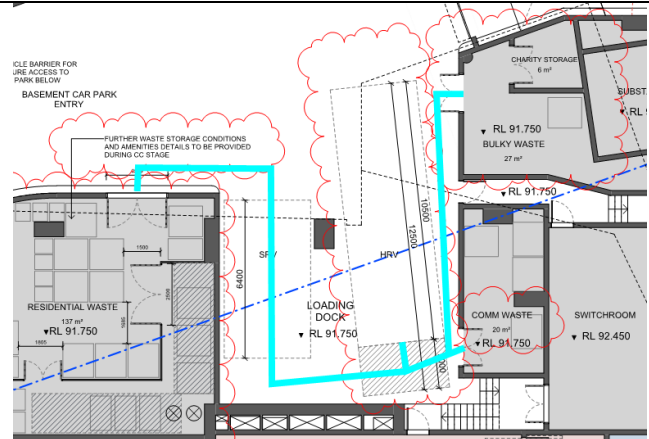
The items related to waste management, and the corresponding responses are detailed below:

RFI Item raised by Willoughby City Council	Response
WCC-7.1 <i>The attached submission includes comments requesting amendments to ensure waste management meets the requirements of the Waste Management Technical Guide and Development Controls by Northern Sydney Regional Organisation of Councils (NSROC). Conditions are provided at Attachment 2.</i>	It is recommended that the waste management strategy is also assessed under the NSW EPA's <i>Better Practice Guide For Resource Recovery 2019</i>, where the guideline for this document results in better outcomes. It is noted that this document is at the state level and is a more recent publication.
WCC7.2 Collection of residential waste: bins and bulky waste <i>Council services residential waste, including bins and bulky waste using HRV trucks. The approved DA (2023/160), has conditions requiring swept paths to demonstrate that Council's 10.5m long HRV will fit into the site and requiring a 12.5m parking space (10.5m truck and 2m rear clearance). The same requirements and conditions need to apply to the SSDA.</i> <i>While swept paths were supplied (PDC Consultant, Transport Impact Assessment, Lower GF 1 Plan Rev 02, 17.02.2025), onsite collection with a Heavy Rigid Vehicle (HRV) was not clearly stated contrary to the Willoughby DCP 2023 Vehicular Access Requirements (NSROC 2018, p34, Table 11).</i> <i>There are two loading bays shown, an SRV bay and an MRV bay and no bays labelled HRV.</i> <i>There are discrepancies between plans in the length of the truck: o Public domain</i>	- The space designated for the Council Waste Truck has been noted as a HRV bay on the updated Drawing SSDA-1010, Revision D dated August 2025 prepared by Embece - Drawing SSDA-1010, Revision D dated August 2025 prepared by Embece and Public Domain Plan both now show a 10.5m truck - A 2m clearance has been labelled on the architectural plans for the HRV space. Council waste truck will reverse into the loading dock area on arrival and drive straight out on to Help Street on departure. It is anticipated that the SRV parking space would only be used on rare occasions be occupied and therefore the bin carting route could pass through the SRV space in most instances. If the SRV space is occupied, the bins will be wheeled towards the bulky waste area and follow the route towards the rear loading area. The bin moving route is depicted below.

plan (EMBECE, Issue - 20.12.2024) shows an 8.8m truck. o LG plan (EMBECE, Issue C, 08.05.2025) shows a 10.5m truck.

- The MRV bay does not show a labelled 2m rear clearance.
- All bin rooms are not located with 2m of the truck parking space and the access to the residential waste holding room is limited due to the SRV bay location if the Council HRV stopped in the existing MRV bay.

In addition, it is not clearly shown how bins and bulky waste will be wheeled or carried around the truck with a 2m clearance for walkway (NSROC 2018, Section 3.16.2 Bin Carting Routes for caretakers and waste Collection Providers. The loading area needs to be designed so that Council's HRV (10.5m long) has a 12.5m long parking space within 2m of each residential collection holding room (bins and bulky waste).



It is noted that the NSW EPA's *Better Practice Guide For Resource Recovery in Residential Developments 2019 – Appendix B Collection services and vehicles* recommends that the route from the bin storage area to the collection point be within 10m of the layback from the nominated collection point.

It is recommended that this requirement is applied to the site rather than the NSROC 2018 guideline, as locating all bin rooms within 2m of the collection vehicle is not realistic in most developments.

WCC 7.3 Residential organics bin capacity

Based on the number and size of units, there is a shortfall of at least 400L per week of organics bin capacity. The service is termed "food organics" in the OWMP, but is actually an organics service (currently garden organics (GO)), but is Council is mandated by the State Government to provide Food Organics (FO) collection by 2030, either as separate FO or combined FOGO).

The OWMP (2025, Rev M, Table 3) provides for only 4,000L of organics capacity per week based on 25L/unit/week. Council requires 120L/unit/week for GO (in the Willoughby DCP 2023 through NSROC 2018, p19) or will consider the NSW EPA (2019) *Better Practice Guide for Resource Recovery in Residential Developments* (Table F2) for FOGO. This requires 4,400L per week based on a calculation using:

- Studio, 1-bed or 2-bed unit: 25L/unit/week. [144 proposed in the architectural plans "Housing SEPP Compliance Plans").
- 3+ bed unit: 50L/unit/week. [16 proposed in the architectural plans "Housing SEPP Compliance Plans")]

The Operational Waste Management Plan (Revision N, August 2025) section 5.1 has been updated to reflect this item.

WCC.4 Non-residential waste generation rates <i>There appears to be a shortfall in the required non-residential bin capacity in the OWMP (2025, Rev M, Table 4: Estimated Waste and Recycling Volumes – Retail) due to potential differences in the site area and benchmarks for the use type. The LG/UG non-residential waste generation is calculated using retail generation rates in the OWMP (2025, Rev M, Table 4) but is specified as a café. Cafes have benchmark higher generation rates than retail.</i> <i>Note: Non-residential organics bins would also be considered favourably.</i> <i>The change in volume (L/week) might require a larger non-residential waste storage area and/or more frequent collection. A possible solution is below within the non-residential waste storage area size provided using more frequent collection.</i>	The Operational Waste Management Plan (Revision N, August 2025) section 6.1 has been updated to reflect Retail generation rate as per this item.
WCC 7.5 Charity waste / other recycling area <i>The OWMP (2025, Rev M) does not clearly demonstrate charity and other recycling storage space (6m²), which is required in the Willoughby DCP (NSROC, 2018, Section 3.12.1).</i>	The Bulky Waste Room as shown in Drawing SSDA-1010, Revision D dated August 2025 prepared by Embece, has been updated to include the charity storage area.
WCC 7.6 Internal residential waste <i>The proposal is not clear that there is a provision for space allocated inside each residential unit for source-separation with capacity for two days waste generation (NSROC 2018, Section 3.8).</i>	It is suggested that this item is address as a Condition of Consent.
WCC 7.7 Waste storage area sizes <i>The waste storage area sizes should be shown on the architectural plans aligning with the OWMP.</i>	Drawing SSDA-1010, Revision D dated August 2025 prepared by Embece has been updated.

WCC 7.8 Waste storage conditions and amenities <i>The proposal is not clear that all of the required conditions and amenities for communal bin storage areas (e.g. NSROC 2018, Section 3.10.3, Table 8) have been met, including location, drainage, taps and aisle width, access, door widths of a minimum of 2.5m (2,500mm) wide. These should be shown on the architectural plans. For example, the OWMP (2025, Rev M, Section 5.6) states a 1.5m door for the bulky waste room which is not compliant with Council's requirements.</i>	Drawing SSDA-1010, Revision D dated August 2025 prepared by Embece. In regards to the 1.5m doorway, the NSW EPA's <i>Better Practice Guide For Resource Recovery in Residential Developments 2019</i> – Section 4.8 Bulky Waste Storage recommended a minimum doorway width of 1.5m to allow for the easy movement of large waste items.
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If further information or clarification is required, please do not hesitate to contact the undersigned.

Kind Regards,

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