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Dear Sam,

Submission on the Draft Guide to Better Practice for Waste Management and Recycling in Multi-unit Developments

Hobsons Bay City Council welcomes the opportunity to provide input to the Draft Guide to Better Practice for Waste Management and Recycling in Multi-unit Developments.

Council understands that the purpose of the guide is to provide councils, developers, architects and building designers, as well as other stakeholders, with an up-to-date better practice guide for waste management and recycling in multi-unit developments (MUDs).

This submission provides feedback on the draft guide and seeks to address some of the key challenges faced by Council for Sustainability Victoria's consideration.

If you would like to discuss this submission further please contact Kaylene Johnson, Coordinator Environmental Management on 9932 1107 or email kjohnson@hobsonsbay.vic.gov.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Bill Millard'.

Bill Millard
Director Strategic Development



Submission on the Draft Guide to Better Practice for Waste Management and Recycling in Multi-unit Developments

Sustainability Victoria (SV) has designed and developed the Guide to Better Practice for Waste Management and Recycling in Multi-unit Developments (the Guide) as a stand-alone information resource. The resource will assist architects, building designers, developers, planners and waste management officers to effectively plan, design and assess appropriate garbage, recycling and organics management systems and facilities for Multi-unit Development (MUDs).

Overall Council agrees with the level of detail and information flow of the Guide. However, there are specific areas that we consider that the Guide would benefit from improvement or clarity within which are listed below:

1. While appreciating the efforts of SV in developing this Guide, we are concerned that the Guide would add to the multitude of requirements for managing waste and recycling in residential MUDs and may cause confusion among developers and other stakeholders. Some of these requirements already in place include the following:
 - a. Better Apartments Design Standards
 - b. waste management requirements through Built Environment Sustainability Scorecard (BESS)/Sustainable Design Assessments (SDA) (noting that not all Council's use this tool)
 - c. improving resource recovery in MUDs toolkit by the Metropolitan Waste Management and Resource Recovery Group (MWRRG)
 - d. independent waste management plan requirements developed by some councils

It is presumed that SV has taken these requirements into consideration while developing this Guide and therefore has provided some details in the Guide. However, clarity is required on how these requirements would be linked and which requirement would receive precedence over the other. We suggest that this link be incorporated into the flow chart provided in the draft Guide (page 24) or in another format.

2. Assessment of a waste management plan is generally undertaken by waste management officers. Apart from this assessment, waste management is also assessed through BESS/SDA by Council's sustainability/environment team, although the level of detail is very basic. An assessment of waste management in BESS/SDA and another assessment through a waste management plan by waste management officers is often a duplication and creates confusion amongst planners and developers. The Guide should provide clarity on this.
3. The Guide does not specifically address waste and recycling management requirements for commercial and industrial developments. The Guide does state



that some of the information contained in the Guide is applicable to commercial and industrial developments. While the priority to address waste and recycling generated from residential MUDs is supported, it is suggested that the Guide specifically encompasses commercial and industrial developments, rather than creating multiple guides for various types of developments.

4. For the purpose of managing waste and recycling the developments are segregated in the Guide based on the height of the dwellings or the number of storeys. Segregating the developments at four storeys goes well with the Better Apartments Design Standards. Factors that contribute in waste and recycling generation include the number of dwellings and the built area of the development. If by example there is two four storey developments, one with 10 dwellings and one with 30 dwellings the waste and recycling needs and infrastructure would differ. This difference is particularly observable in developments in outer suburbs and inner city developments. Consideration should be given to incorporating the number of dwellings or the area of the development in the Guide.
5. Page 62 of the draft Guide talks about low-rise development of up to four residential storeys. While describing the development under 'development type', the Guide says "This category includes two to three-storey walk-ups...". This is confusing as it is not clear whether this section also includes developments having four storeys.
6. The Guide follows the residential and commercial waste generation rates of the City of Melbourne. It is unclear whether research and data analysis has been undertaken prior to deciding to follow the City of Melbourne's waste generation rates. Since this Guide will be followed across the state, its implications on managing waste in future developments would be significant. It is suggested to consider this prior to finalising the guide.
7. The time taken to collect waste from kerbside particularly from large bins or skips (1,100 litres or 3m³) generally takes longer than smaller mobile garbage bins. Often kerbside collection of large bins, particularly from major shopping precincts and busy intersections, impacts on normal traffic and pedestrians. It is important to minimise this impact. The Guide states that the distance from the storage area to the collection point should not exceed 75 metres (page 42). In addition to this information, it is suggested to include information on the average time taken to collect different size bins. This would assist developers to take the time to factor into consideration while designing waste collections for their developments and also provide valuable information to planners to assess proposals. It is also suggested to consider mandating on-site collections for bins or skips larger than 1,100 litres or three cubic metres so as to avoid off site amenity and access impacts.



8. The Guide states that waste rooms should not be located more than 75 metres from a dwelling (page 42). While we agree that locating bin bays and collection points away from residents would reduce the impact of noise and odour, 75 metres is too far for residents to dispose garbage on a daily basis where chutes are not provided.
9. In order to meet waste generation estimates, developers tend to increase the number of collections so that they can minimise the number of bins and reduce the size of bins where possible. For any reason if the collection has not taken place, the development's waste and recycling management would be severely affected. To mitigate this issue, it is suggested to include a minimum requirement in Appendix 2 (Commercial Waste Generation Rates) that irrespective of the collection frequency, the volume of waste storage containers provided must store at least two days' worth of waste and recycling to avoid over flow and internal or external amenity impacts. In addition higher number of collections of bins from the kerbside cause off site amenity and access impacts therefore the Guide should encourage limiting waste collection to once a week for residential MUDs
10. The Guide could provide useful information on issues that impede bin presentation and waste collections from the kerbside. It is important to ensure that street frontage is available for presenting and collecting bins. It is suggested that the Guide provide more information of the types of considerations that developers must have when designing their waste management system. This would include plan drawings of street infrastructure such as overhead powerlines and lighting, tree plantings, car parking, traffic signs, driveway clearances and their relevance to the spacing and locations of bins.
11. In order to improve clarity, it is suggested to include driveways in most drawings shown in the Guide (for example page 59 and 60).
12. The service lift diagram shown on page 114 of the Guide is one example of a chute system but one that is not considered practical or often used in developments in Victoria. Residents directly dispose their waste and recycling through the chute system from each floor and generally do not use service lifts as shown. It is suggested to consider a more relevant diagram that reflects the chute system generally followed in addition to the example shown with proper explanation.
13. Recycling of organics is aimed at not only diverting organic waste from landfill but also to reduce the overall impact of greenhouse gas emissions. The Guide provides options for processing organics using dehydrators and incinerators. At least some of the dehydrators and incinerators available in the market are energy intensive, noisy and generates odour. It is suggested that the overall environmental impact of these types of equipment be assessed or a minimum



energy rating be recommended. Another option is to link this with BESS/SDA so that the environmental impact of these types of equipment is captured.

14. The drawing on possible communal area layout (page 105) does not show provided space for bin circulation which is an important element of a bin storage area.
15. The Guide rightly notes that the resource recovery rate in MUDs are lower than single dwellings. Hard waste and electronic waste (e-waste) collections from MUDs are aimed at improving resource recovery. Though the Guide encourages hard waste and e-waste collections, it does not provide an acceptable generation rate for these types of items even though a number of studies have been undertaken and data is available. It is suggested that the Guide recommends a storage space allocation based on the generation rates.
16. Appendix 3 (Waste management trigger tool) provides different waste management options for typical thresholds or triggers. Some councils use 360 litre mobile recycling bins as communal recycling bins. It is suggested to include this bin size in the mix of options available for waste and recycling managements.
17. Some larger developments often include mixed uses including commercial premises. When applying for planning approval, generally the plans do not specify the type of commercial premise that might occupy these spaces. These spaces are usually tenanted when the development is complete. As a result, councils find it difficult to apply specific waste and recycling generation rates for these types of developments. And there is potential for the waste and recycling generation rates to be underquoted if a food bases premise takes up the tenancy at a later date. It is suggested that the Guide provide clarity on this issue and put the onus on developers to amend the plans and seek council approval if the nature or type of the commercial premise changes. Also to recommend that where uncertain that councils apply the worst case waste and recycling generation rate (ie the restaurants or supermarket rate) if the specific nature of the commercial premises is not provided.
18. The Guide would also benefit by including recommended road widths required for different sizes of trucks particularly where developments are proposed in laneways. The Guide should act as a ready-reckoner for developers, planners and waste managers.
19. The waste management plans for large developments including mixed use developments and precinct scale developments generally require a bin presentation map and waste collection travel route. When designing a collection route for a Council collection it is important to ensure that the bins are presented on the left hand side to the design of the collection vehicle. Examples of a bin



- presentation map and waste collection vehicle travel route in the Guide would assist developers to describe their proposal more clearly to council.
20. Transporting commercial waste through residential corridors can affect the amenity and quality of residential corridors. In page 78 under commercial waste, it is suggested to include a statement that the travel path for commercial waste disposal should avoid going through residential corridors. Consideration should also be given to include in the waste management plan checklist that commercial waste storage travel paths avoid residential corridors.
 21. In principle the requirement to separate residential and commercial waste facilities in mixed-use developments is supported. However, it is hard to enforce in small mixed-use developments.
 22. It is suggested to update the turning circle template vehicle dimensions table (page 130) and appendix 10 (collection vehicles) with small rear lift vehicles of 6.4 metres length. This recommendation is based on Councils experience of proposals for private collections in waste management plans.
 23. The annual organic waste generation rates for commercial developments is a welcome addition. However, the basis for organic waste generation rate is on full time equivalent staff. It is unclear whether at the time of a town planning application stage, developers would be able to provide information on full time equivalent staff they would be engaging so that it is available for assessment.
 24. In Appendix 3 (Waste management trigger tool) under 'kerbside council collection' in key requirements, it is suggested to include a second dot point 'To be determined in consultation with council as council would need to establish whether a kerbside collection is feasible'.
 25. Page 144 section D3 specifies permitted collection times. Council sometimes require off-peak collection times to avoid conflict with peak hour traffic and also consistency with their local laws. Consideration should be given to include an option that allows for this scenario.