



9 October 2025

Ms Abbie Galvin
Government Architect NSW
Department of Planning, Housing and Infrastructure
Locked Bag 5022, Parramatta NSW 2124.
By email: government.architect@planning.nsw.gov.au

cc: CEOs of Sydney regional organisations of councils, Resilient Sydney & NSW Strata and Property Services Commissioner
mmontgomery@lanecove.nsw.gov.au; amanda@wsroc.nsw.gov.au;
joanna.kubota@theparks.nsw.gov.au; mdewsnap@cityofsydney.nsw.gov.au;
angus.abadee@customerservice.nsw.gov.au

Dear Abbie Galvin,

Planning for affordable & effective waste services in the NSW Housing Pattern Books

We have consulted with our member councils in Sydney who have a number of concerns regarding delivering waste services to the upcoming Mid Rise Pattern Book designs due to be released later this year, as well as the recently published Low Rise Pattern Book designs. While the Pattern Book designs promise high quality, long lasting, functional homes, this undertaking will be derailed if waste services cannot be effectively delivered.

Our councils request that the **Mid Rise Pattern Book designs all have adequate truck access and space for onsite waste collection and servicing**. Kerbside waste collection and service options will not function as a workable generalised solution if fast-tracked as new forms of complying developments, wheel-in and wheel-out services require council assessment of the suitability of the site, access, traffic conditions and the impact on the streetscape.

Onsite servicing means that the council's collection vehicle will enter the building and service the building from a designated loading area with access and safe entry and exit for heavy rigid collection vehicles as per AS2890.2. It also requires space for general waste, recycling and organics bins, as well as bin rooms of sufficient size for bulky hard wastes such as furniture and white goods. Example council design requirements have been provided at the end of this letter.

If the Mid Rise Pattern Books do not incorporate onsite collection requirements as part of the designs, residents living in or near the recommended built designs are likely be subjected to a number of consequences and risks. If these long-term impacts on the streetscape and local amenity occur, there are likely to be reputational risks for the NSW Government Architect, local and state governments to manage that cannot be readily mitigated.

Some of the key risks are outlined below:

1. Poor resident affordability outcomes

Residents pay higher, unregulated fees for private contractors to service these buildings because the buildings cannot be serviced by councils' waste fleet, which impacts the affordability of the dwelling for residents. Section 496 of the Local Government Act 1993 requires councils to levy an annual domestic waste management charge (DWMC) for the provision of a waste management service on each parcel of ratable land, which applies even if councils do not provide a waste service to that building. Occupants of residential buildings that cannot be serviced by councils' waste fleet would nevertheless be charged a DWMC as well as needing to pay for a private waste contractor.

Furthermore, there is no mechanism to ensure that recycling and FOGO services are delivered as intended when private servicing is used. In practice, this can result in all material streams being sent to landfill in a single vehicle, while residents are still charged for all three separate services.

Councils in Sydney get frequent requests from residents and strata bodies in previous state significant developments (SSD) seeking to change from their private waste contractor to council services due to these extra costs and to improve the services offered, but find they are trapped paying higher fees with typically poorer recovery outcomes. This creates inequitable services offered in a local government area and does not support the NSW Government waste diversion targets.

In addition, private operators generally have to use smaller vehicles that cannot collect large volumes so they need to service the building more frequently. That results in more vehicle and truck movements in and out of the building, increasing traffic, noise and carbon emissions.

2. Work, health and safety (WHS) risks

Residents or building staff often have to drag heavy 660-litre bins up driveways and onto the street leading to WHS risks. Some apartments use 1100-litre bins which can weigh between 200 and 500 kg when full. Council staff and contractors face WHS risks moving heavy bins from footpaths, up and down kerbs and into a space where it can be lifted by a council waste truck. Collections should always be designed to minimise hazardous manual tasks under the Work Health and Safety Regulation 2011 and the Hazardous Manual Tasks Code of Practice. There is also no minimum road width in the NSW Roads Act 1993, and narrow streets and laneways can be very difficult for waste collection vehicles to access.

3. Bins creating pedestrian, parking and traffic hazards for the public

Mid Rise Apartments that do not have onsite collection, either use larger bins mentioned above or place large numbers of 240-litre bins outside the apartment usually on the footpath, verge, road or blocking driveways, causing serious pedestrian and traffic hazards that are compounded in windy weather when the bins fall over. Larger bins also impact sight lines for motorists.

Unfortunately, there are many examples of mid-rise apartments in Sydney with this problem usually from developments that bypassed council such as SSDs or where council conditions for onsite collections were overturned in court. Good practice model housing designs should not embed these hazards and functional flaws.

4. Illegal dumping hotspots

Streets without adequate onsite waste collection and storage almost always become illegal dumping hotspots and unfortunately there are many examples of this around state significant developments in Sydney. When residents in apartments do not have a bulky waste area within the building envelope, bulky waste is often dumped on the verge, in driveways and on the road. Due to

the number of households in each apartment block, small piles quickly attract more dumping and become large, but are difficult to trace back to individual dwellings.

As well affecting the visual amenity of neighbourhoods, this also impacts pedestrian and vehicle access, as well as having long term effects on the local amenity and market value of the property and surrounding area. In some council areas, this also increases fire risk, as dumped waste can attract vandalism and arson.

Councils in Sydney try to avoid on-street bulky waste collection from apartments with significant numbers of households because of the risks outlined above and because it reduces pedestrian and vehicle access, parking, and street landscaping and urban tree canopy.

Attachment A to this letter provides actual examples of the consequences of not designing for onsite waste collection and servicing, these consequences place ongoing financial and safety costs for residents and government for the life of the development.

A critical way to mitigate the risks outlined above is to ensure that each of the Mid Rise Pattern Book designs accommodate waste storage and collection needs within the building envelope through onsite waste storage and collection. This is particularly important because the Mid Rise Pattern Book designs will bypass local council Waste Development Control Plans and will be approved by private certifiers. Private certifiers are unlikely to have expertise in the complex waste planning needs for Mid Rise apartments and may not be able or required to assess the suitability of an individual site for kerbside collection.

This assessment usually requires careful consideration from council planners, traffic engineers and waste staff. It is important to recognise that councils have significant experience with these issues. Buildings, once built, cannot be retrofitted for onsite services as access heights cannot usually be changed, nor can bin rooms be easily added. This leaves legacy problems and ongoing costs for the residents of those buildings.

Resources and examples outlining design requirements for Mid Rise dwellings can be found at:

- [NSW EPA's Better Practice Guide for Resource Recovery in residential developments](#)
- [City of Canterbury Bankstown's Waste Management Guide for New Developments see onsite requirements from pg10*](#)
- [City of Sydney's Waste Management Guidelines for New Developments pg. 16 onwards*](#)
- [Sutherland Shire Council's Waste Collection for New Multi-Dwelling Housing and Residential Flat Buildings*](#)

*Please note, many of our councils are currently updating their Waste Development Control Plans to include the collection of food organics aligned with the NSW Government Food Organics and Garden Organics Mandate. These new requirements will add additional bins to apartments which will exacerbate existing problems with kerbside collection.

As a next step, we seek to meet with staff of the Government Architect (and potentially the architects involved in the Mid Rise Pattern Books) to assist them in planning for adequate onsite waste storage and collection responses. We can bring relevant council staff with expertise in these issues to this meeting. We can also liaise with other Sydney regional organisations of councils to bring relevant council expertise from different parts of Sydney to this meeting. This could also be an opportunity to discuss specific concerns with the Low Rise Pattern Book designs which will have limited street frontage to collect the significant increase in bins at those dwellings.

We hope to work with you to ensure that the Mid Rise Pattern Book designs adequately plan for the waste and resources generated by the occupants as a critical design criterion to achieve the NSW Government's targets to deliver affordable housing that is also liveable.



Whilst this letter has been reviewed by waste planning specialists in some of our councils, in order to make this advocacy ahead of the release of the Mid Rise Pattern Book designs, it has not been possible for it to be formally reviewed by councils or to be endorsed by a formal meeting of SSROC Delegates. I will contact you further if any issues arise as it is reviewed.

Please contact me at helen.sloan@ssroc.nsw.gov.au to coordinate a meeting and further discuss these concerns.

Yours sincerely

A handwritten signature in black ink, appearing to read 'H Sloan', is positioned below the 'Yours sincerely' text.

Helen Sloan
Chief Executive Officer
Southern Sydney Regional Organisation of Councils (SSROC) Inc

Attachment A: Examples of the consequences of not designing for onsite collection in Mid Rise Developments

This document illustrates pictorially some of the problems generated by not having adequate, functionally designed, onsite waste collection solutions and servicing:

1. Poor resident affordability outcomes
2. Work, Health and Safety Risks
3. Rows of bins on streets creating pedestrian, parking and traffic hazards
4. Illegal dumping on streets
5. Inability to retrofit most apartment built forms.

There are many examples of Mid Rise apartments where these problems are apparent in Sydney. These problems usually arise as a consequence of the developments bypassing Councils such as State Significant Developments or where councils DCP conditions for applying onsite collections were overturned in court. The photos include some examples where onsite collections are absent in one building or more neighbouring buildings.



Design Flaw: State Significant Development in Sydney with multiple Mid Rise Apartments between 5 and 10 storeys not designed for onsite collection and with no bulky waste storage areas.

Risks / consequences: Bins take up large sections of the footpath blocking pedestrian access, on windy days they fall into the road creating traffic hazards. The lack of onsite bulky waste storage has meant this area has become an illegal dumping hotspot resulting in poor amenity outcomes for local residents and ongoing costs for council.



Design Flaw:

No onsite collection or vehicle access for student accommodation apartment (state significant development) in a busy pedestrian thoroughfare that is opposite a metro train station.

Risks / consequences:

Bins are located in a major pedestrian and retail thoroughfare unsuitable for rows of bins creating hazards for pedestrians, bins need to be wheeled to closest roadway to meet collection trucks, for the heavier bins this creates work, health and safety (WHS) risks for collectors. Building maintenance area is also blocked by the bins.



Design Flaw:

No onsite bin room or space for bulky waste for this mixed residential and commercial eight storey apartment in Sydney.

Risks / consequences:

Whenever a bulky, mixed waste collection is needed it is placed out on the street, attracting illegal dumping and creating pedestrian and vehicle hazards. This leads to poor amenity outcomes for residents and may affect local real estate values.



Design Flaw:

No onsite servicing and no space for bin collection on a major artillery road.

Risks / consequences:

Blocks vehicle and pedestrian access on a major busy road, if windy the bins can spill onto the major road. This image also illustrates how these issues can affect the visual amenity and liveability of the area which can potentially effect things like the resale of apartments.



Design Flaw: No onsite servicing for this 7 storey Apartment in Sydney.

Risks / consequences: Both 660litre bins and 240 litre bins have to be dragged onto the road and down a kerb presenting WHS risks and creating traffic hazards. Collection truck has to stop in carriageway of the main road and in no stopping zones to get close enough to empty the bins.



Design Flaw: No onsite servicing for Mid Rise Apartment on busy road in Sydney.

Risks / consequences: Bins blocking footpaths and attracting illegal dumping on a major road and shopping district. Additional safety issue of having to wheel out heavy large bins because the truck cannot service or enter the building. Collection truck has to stop in carriageway of the main road blocking traffic. This development is 7 storeys with 63 units.



Design Flaw: No onsite servicing for 5 Mid Rise Apartment buildings in Sydney. Each building is 3-5 storeys. This was a State Significant Development that proposed twice weekly collections for 1200 units yet the council service is only weekly.

Risks / consequences: Overflowing bin storage area with excess bins placed on road where they restrict traffic and parking. Insufficient bin capacity and storage for a weekly collection service.



Design Flaw:

No onsite servicing for Mid Rise Apartment in Sydney.

Risks / consequences:

Bins presented in front of parked cars on both sides of a busy road affecting traffic and parking access. Collection truck has to stop in carriageway of the main road to get close enough to empty the bins, blocking traffic. Low/midrise development area, developed (on the right) from five former single dwelling properties to three Residential Flat Buildings, each one is three storeys.



Design Flaw:

No onsite servicing for three storey apartment in Sydney that has limited street frontage for bin presentation and collection.

Risks / consequences:

Bins placed on road create traffic hazards and reduce parking available on a street right near a metro train station. This development changed from three single dwelling properties to 16 units, increasing the demand the parking on this street.



Design Flaw: No onsite servicing for three storey apartment in Sydney at the end of a cul-de-sac with very limited street frontage for bin presentation and collection.

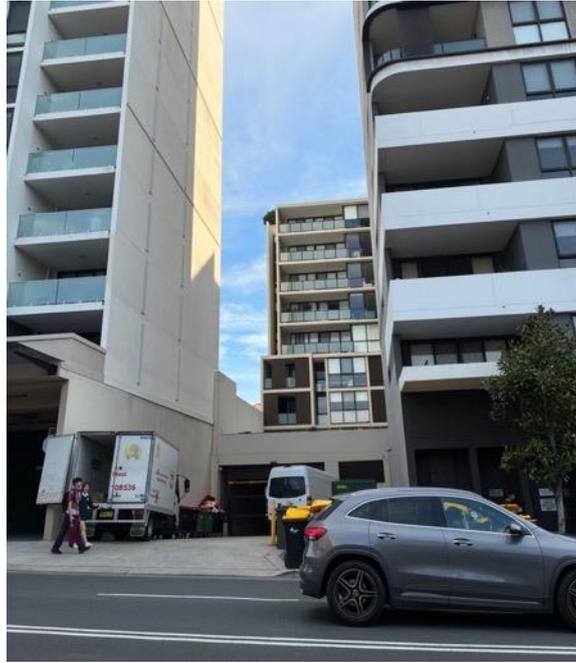
Risks / consequences: Bins placed on road create traffic hazards and reduce parking available near a metro train station. This development changed from three single dwelling properties to 35 units, increasing the demand for parking on this street.

Design Flaw:

Narrow Streets that cannot be accessed by Council's waste fleet and have not been designed for waste collection by heavy rigid vehicles.

Risks / consequences: WHS risks of having to drag heavy bins up laneways and narrow streets for both residents and waste collectors. Potential risks to property and collection vehicles trying to navigate tight, narrow corners and having to reverse. Reputational risks to local and state government of poorly designed buildings and streets, and the risk of some services like recycling or organics collection not being feasible in hard to reach areas.





Design Flaw: No onsite servicing and development did not comply with council's requirement to provide a ground floor accessible bin storage area.

Risks / consequences: Bins stored in the public domain and outside a commercial outlet, creating hazards to pedestrians and risk of impact on commercial outlet's business. Location attracts illegal dumping and subject to windblown litter. Bin collection often blocked by parking and building users (e.g. removalist truck blocks bin servicing).



Design Flaw:

Development did not comply with the council's waste service requirements therefore the residential property had to use a private contractor.

Risks / consequences:

Private service is a greater cost to residents who have to pay both the domestic waste levy and pay for a commercial waste collector. No recycling service can be provided to this building; and the high frequency of collections has also generated noise complaints to council. Bins are left in the public domain outside a commercial outlet and blocking the footpath.

There is very limited recourse for council to address this problem due to the building design and because it's a private service.



Design Flaw: Low basement height preventing onsite servicing by Council Heavy Rigid Vehicles and no dedicated bin room for bulky waste.

Risks / consequences: Restricted vehicle access causing traffic and pedestrian hazards from bulky waste having nowhere to go. No storage or bin room for bulky waste collections means even booked collections attract illegal dumping leading to access issues for residents in apartments.