21 February 2025
Our Ref: 21BRW0002
Your Ref:

Attention: Mark Clayton

Construction, Forestry, Mining & Energy Industrial Union of Employees
QLD State Construction & General Division
C/- Urbicus Pty Ltd
110 Kennedy Terrace
Paddington QLD 4068

Dear Mark,

RE: 19 – 25 Campbell Street, Bowen Hills - Waste Management Response to Further Issues

Introduction

Colliers International Engineering & Design (TTMC) Pty Ltd, formerly TTM, has been engaged to provide a response to the ***Waste Management*** items outlined in the Further Issues Letter received on 10 January 2025 issued by Economic Development Queensland (EDQ). The request is in relation to an S99 Change to a Development Approval, application reference DEV2021/1193/3 for a proposed Build-to-Rent residential development.

In response to the information request, additional information will be provided and as required, including:

- Relevant information relating to the relevant planning instruments and collection contractor.
- Relevant information relating to the refuse collection vehicle access and manoeuvring.
- And as required, amendments made to the architectural drawings.

Item 9 – Servicing Arrangements

a) The submitted Operational Waste Management Plan, prepared by TTM (Revision No. 4, dated 21 August 2024) states that the refuse collection for residential refuse is "designed to be serviceable by Council", however the Refuse Planning Scheme Policy requires refuse for multiple dwelling developments to be collected by Brisbane City Council (BCC).

i) Provide confirmation that the residential refuse will be collected by BCC.

b) Further to the above, the Operational Waste Management Plan appears to base its assessment on a superseded version of the Brisbane City Plan 2014, that being Version 21 rather than the current Version 31.

i) Submit a revised Operational Waste Management Plan demonstrating assessment against the most current version of the City Plan 2014.

Colliers Response:

Item a) & b): The submitted application relates to an S99 Change to development approval, which refers to a change other than a substantial change. This type of approval is considered to be equivalent to a Minor Change application. Typical practice for minor change or applications other than a significant change is to apply the planning benchmarks relevant at the time of the original application to design, unless a major shift in policy would otherwise render the site unserviceable.

For this development, Version 21 of the BCC City Plan 2014, was the relevant planning instrument at the time of the original approval and is considered to be the appropriate planning instrument for this design and the Operational Waste Management Plan (OWMP) prepared for the site.

Notwithstanding, the performance solutions approved as per the original design are unchanged in the S99 design. For completeness, Colliers have prepared a checklist comparing the design to the latest refuse PSP, Version 31. Note, the Refuse PSP was last amended in City Plan update Version 29 implemented in December 2023. The significance of the amendment does not allow line-for-line comparison of the two versions.

The requirement for BCC or their appointed contractor to service residential development was included into the Refuse PSP as part of the Version 29 amendment. Additionally, changes have recently been made to rating charges specifically for Build to Rent developments. As stated in the OWMP the site has been designed to be serviceable by councils appointed collections contractor and will be collected by council if required.

Colliers note that Build-to-Rent developments are non-strata titled properties whereby each dwelling or development component, including non-residential uses, exists under a single title. As such have been historically considered commercial use properties from a council rating perspective. Where properties are commercially rated different waste levy rates may be applicable. In these instances, where a property is considered commercial use, private collection contractor is typically available to development operators.

Conclusion

Based on the assessment contained within this Colliers considers the proposed refuse management arrangements suitable for the subject site.

Kind regards,

Neville Lee
Lead Consultant – Waste
Colliers International Engineering & Design (TTMC) Pty Ltd

Attachments – Refuse PSP V31 Checklist Comparison

BCC SC6.26 Refuse Planning Scheme Policy		
Item	Requirement	Compliance / Comment
Section 3 - Access and Manoeuvrability		
(1)	The manoeuvring of the refuse collection vehicle is undertaken in a safe and efficient manner, without detrimental impacts to pedestrian amenity or safety, Council or private infrastructure or the function of the road network.	Refer to traffic engineering documentation.
(2)	For multiple dwelling development accessed via a local, neighbourhood, district or suburban road, the refuse collection vehicle may enter the site in a reverse gear in a single movement.	N/A Forward-in, forward-out manoeuvring provided.
(3)	For multiple dwellings development accessed via an arterial road, or where the refuse collection vehicle cannot reverse onto the site in a single movement, the refuse collection vehicle must enter and leave the site in a forward gear.	N/A
(4)	For development (other than a multiple dwelling) accessed via an arterial, suburban, district or minor road adjacent to an intersection with a major road, the refuse collection vehicle must enter and leave the site in a forward gear.	N/A Forward-in, forward-out manoeuvring provided.
(5)	Where refuse collection is from an on-site position, the area trafficked by the refuse collection vehicle must comply with requirements under the Transport, access, parking and servicing planning scheme policy including a minimum aisle/carriageway width of 6.5m wide. *Note—Service area design standards, including maximum gradients, minimum aisle widths, minimum vertical clearance and bay design are contained in the Transport, access, parking and servicing planning scheme policy.*	6.2m provided, consistent with approved development.
(6)	For detached dwellings on rear lots, pavements/carriageways trafficked by a refuse collection vehicle have a minimum width of 5.5m.	N/A
(7)	All entry and exit points are of a width and design that allows for sufficient ingress and egress for the refuse collection vehicle, including a minimum 6.5m crossover which is free from overhead projections inclusive of gardens or trees.	Type B2 crossover provided, consistent with approved development.
(8)	To maximise safety, the distance required for refuse collection vehicles to reverse on-site is minimised. Where on-site turnaround of the refuse vehicle cannot be achieved, the bin storage area and collection point is located within 20m of the street frontage.	Compliant
(9)	Turnaround facilities for a refuse collection vehicle exist or are provided for where involving staged subdivision developments or where development is located on a no through road. Turning and manoeuvring facilities for refuse collection vehicles are provided to meet design requirements for the vehicles identified in Table 3.	N/A
(10)	Subdivision layouts are to provide for the safe and efficient operation and manoeuvring of a side-lift loading refuse collection vehicle. Layouts that require a refuse collection vehicle to reverse more than 20m are to be avoided. Where the provided transport network results in a stub road for a proposed future road connection, interim turnaround facilities must be provided in compliance with the Transport, access, parking and servicing planning scheme policy and the Infrastructure design planning scheme policy.	N/A
(11)	Adequate lift clearances are provided to overhanging trees and wires in accordance with Table 3.	Compliant
(12)	The required vertical and horizontal clearances are provided for the service to operate safely and efficiently. Operational clearance dimensions are shown in Table 3 for various types of collection arrangements.	Compliant
(13)	Access for a refuse collection vehicle to the collection point is maintained at all times.	Shared loading bay, consistent with approved development.
(14)	Where non-residential development is proposing to use an alternative design vehicle other than those named in Table 3, written confirmation from the proposed licensed waste collection contractor giving full details of the bin size and the refuse collection vehicle size must be provided.	N/A – BCC spec rear-loading RCV proposed.

(15)	In instances where the gradient of the on-site manoeuvring area is greater than 5% (1:20), the pad that the collection vehicle will stand on while accessing refuse bins at the collection point, is to have a maximum gradient of 2% (1:50). *Note—Access arrangements, including maximum gradients are contained in the Transport, access and parking planning scheme policy*.	Compliant – RCV stands on a flat grade.
Section 4 - Residential Refuse Collection		
(1)	Residential development must be serviced by Council or their appointed collection contractor. *Note—For the purpose of this section residential development is defined as Dual occupancy, Dwelling house, Dwelling unit and Multiple dwelling.*	Site designed to be serviceable by BCC – noting previous comments on BtR developments.
(2)	Residential development is to provide sufficient capacity for 240L of refuse and 240 or 360L of recycling per dwelling, allowing for one collection per week. *Note—Council offers an optional user paid 240L green waste service. Where this service is to be utilised additional capacity must be designed for.*	Performance solution of 180L / week for recycling used, as per the approved scheme. 3 collections per week proposed in line with BCC 'refuse requirements for development in Brisbane' guidelines.
(3)	Residential development is to utilise kerbside collection where the locations for both the bin storage area and kerbside collection point can be appropriately accommodated in accordance with section 4.1. *Note—This applies to kerbside collection from a dedicated road frontage and from an internal circulation road where it can accommodate a refuse collection vehicle.*	N/A – Greater than 10 dwellings
(4)	On-site collection must be provided for in the following cases: a. the development cannot accommodate external (fronting public road) kerbside collection; or b. the development comprises greater than 10 dwellings; or c. where the road verge is not properly shaped to the standard 1:50 gradient and a minimum of 2.5m wide or where the longitudinal road gradient is greater than 1:10.	Compliant
(5)	Refuse and recycling collection for a mixed use development ensures residential and commercial bins are stored separately with separate access to each.	Compliant
Section 4.1 - Kerbside Collection (MGB's) – Greater than 10 dwellings, kerbside collection not proposed		
Section 4.2 – On-site Collection (Bulk Bins)		
(1)	In accordance with section 4, development will avoid adverse impacts to residents, pedestrians and roads users by providing sufficient capacity to achieve one collection per week while ensuring sufficient refuse and recycling capacity is provided to meet the needs of residents.	Unchanged service frequencies from the approved design. 3 Collections per week proposed. Proposed collection frequency aligns with BCC 'refuse requirements for development in Brisbane' guidelines.
(2)	An on-site dedicated pedestrian route is provided and is separate from the required vehicle manoeuvring area to ensure pedestrian safety is protected. The pedestrian route is to provide access from the site's frontage to the development and will have a minimum width of 1.2m.	Compliant
(3)	Bulk bins of 1.1m^3 or less are positioned so that collection personnel do not have to move them more than 5m. If a gradient is evident, speed bumps are provided to stop bulk bins from rolling away from the collection point. *Note—Standard design arrangements, including gradients are contained in the Transport, access and parking planning scheme policy*.	Per OWMP: Servicing and collection points are located adjacent to each other, consistent with the approved scheme.
(4)	Bulk bins of 1.5m^3 or more are positioned so that front-lift refuse vehicles can drive directly to the container without relocating the bulk bin. If this cannot be achieved due to physical constraints, then the bulk bins are not moved more than 3m from the storage area to the collection point.	N/A

Section 4.2 – On-site Collection (Bulk Bins) - Continued		
(5)	The storage areas for bulk bins are: a. contained in a roofed and wholly screened enclosure or room of sufficient size for the bulk bin quantity required; b. easily accessible for residents and for the required servicing of bins; c. screened from neighbouring properties to mitigate odour, amenity and noise; d. of a design to mitigate the harbourage of vermin or attraction of scavenging animals; e. provided with natural or temperature-controlled ventilation if in an enclosed room; f. of a design which maintains a minimum internal vertical clearance of 2.1m; g. kept clear of obstructions, such as fixed bay separators, that impede the ability to change from existing bin sizes or which otherwise limit future refuse collection options; h. are not to contain other amenities such as air-conditioning compressors, hot water systems or electrical hubs. *Note—Where screening is utilised to form part or all of a refuse storage area, the screening is to have a maximum of 25% openings, with a maximum opening dimension of 50mm, and are to be permanently fixed, durable and maintainable.* *Note—Allow for at least an additional 0.5m clearance surrounding each container, or for the storage of multiple bins, 1.5m clearance around the combined bin area (whichever is lesser).*	Compliant
(6)	Best practice may include allowing additional space for the storage of extra containers to separately store either organic waste or other recyclables in the future.	N/A
(7)	If a refuse or recycling chute is provided: a. it is to be constructed to allow refuse to fall into the centre of the bin; b. it is to have a door / lid to ensure clean changeover of bins; c. the chute room must be of suitable size to allow for an additional bin/s to remain under the chute discharge/s at all times; d. separate chutes and bulk bins are to be used for each waste stream; e. the room containing the chute and bin or compactor excludes all but authorised personnel; f. design best practice may include developments greater than 15m (3 storeys) in height utilising twin chutes or single chute dual stream technology with openings on each residential floor to enable chute disposal of both refuse and recycling.	Compliant
(8)	Environmental best practices may also include the installation of a trapped waste connection to the sewer system.	Compliant
Section 5 – Non-Residential Refuse Collection		
(1)	Non-residential development is to provide sufficient capacity to achieve low-frequency servicing in line with Table 2.	Unchanged service frequencies from the approved design. 3 Collections per week proposed.
(2)	Refuse generation rates for specific uses are provided in Table 4. These figures are to be used to calculate the refuse and recycling capacity required. *Note—Where a refuse generation rate is not defined in Table 4, the applicant is responsible for providing evidence in support of the refuse generation proposed.*	Refuse generation rates unchanged from approved design.
(3)	Sufficient information is provided to demonstrate that refuse collection can occur in an efficient and safe manner on site without adverse impact on amenity (acoustic, odour or visual impacts) and pedestrian and vehicular traffic.	Per OWMP: Refuse collection contractors can enter the loading dock at anytime however it is likely that timeslots will be assigned by loading dock or facilities management.

Section 5 – Non-Residential Refuse Collection - Continued		
(4)	This information may include evidence from a refuse collection contractor to demonstrate that collection will occur outside normal service/delivery or business times, where seeking permission to allow a refuse collection vehicle to use service bays or parking spaces on the site for access.	Additional information not typically required where serviceable by BCC contractor.
(5)	Bulk bins of 1.1m3 or less are positioned so that collection personnel do not have to move them more than 5m. If a gradient is evident, speed bumps are provided to stop bulk bins from rolling away from the collection point. *Note—Standard design arrangements, including gradients, are contained in the Transport, access, parking and servicing planning scheme policy.*	Compliant
(6)	Bulk bins of 1.5m3 or more are positioned so that front-lift refuse collection vehicles can drive directly to the container without relocating the bulk bin. If this cannot be achieved due to physical constraints, then the bulk bins are not moved more than 3m from the storage area to the collection point.	N/A
(7)	The storage area for refuse bins are: a. contained either within a building or a roofed and wholly screened enclosure of sufficient size for the bin quantity required. Table 1 provides the bin types and dimensions; *Note—Where screening is utilised to form part or all of a refuse storage area, the screening is to have a maximum of 25% openings, with a maximum opening dimension of 50mm, and are to be permanently fixed, durable and maintainable.* b. easily accessible for occupants and for the required servicing of bins; *Note—Allow for at least an additional 0.5m clearance surrounding each container, or for the storage of multiple bins, 1.5m clearance around the combined bin area (whichever is lesser).* c. screened from neighbouring properties to mitigate impacts from odour, amenity and noise; d. of a design to mitigate the harbourage of vermin or attraction of scavenging animals; e. provided with natural or temperature-controlled ventilation if in an enclosed room; f. of a design which maintains a minimum internal vertical clearance of 2.1m; g. kept clear of obstructions, such as fixed bay separators, that impede the ability to change from existing bin sizes or which otherwise limit future refuse collection options; h. are not to contain other amenities such as air-conditioning compressors, hot water systems or electrical hubs.	Compliant
(8)	Best practice may include allowing additional space for the storage of extra containers to separately store either organic waste or other recyclables in the future.	N/A
(9)	Where disposal of industrial or commercial liquid waste by discharge to a road tanker, the road tanker is to be wholly on-site during collection.	Compliant