



Mr David Reynolds  
Chief Executive  
Department for Trade and Investment SA  
250 Victoria Square/ Tarntanyangga  
Adelaide South Australia 5000

Email: [PlanSA@sa.gov.au](mailto:PlanSA@sa.gov.au)

6 November 2023

Dear Mr Reynolds

**Re: Greater Adelaide Regional Plan Discussion Paper**

Thank you for the opportunity to provide feedback on the *Greater Adelaide Regional Plan Discussion Paper*. The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$15.8 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. WMRR's members are involved in the breadth and depth of waste management and resource recovery, engaging in significant activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residuals and problematic wastes.

An integrated WARR system is good for both the environment and the economy, given that it drives jobs and economic growth. At present in South Australia (SA), WARR activity directly and indirectly employs around 5,000 people with an annual turnover of greater than \$1 billion and contributes around \$0.5 billion to Gross State Product.<sup>12</sup> SA also leads the nation in its levels of resource recovery, with a rate of 81.9% reported for 2021-22. With almost four (4) million tonnes of materials recovered from households, businesses and construction activity processed locally through SA facilities resulting in a reduction of greenhouse gas emissions by 1.31 million tonnes of CO<sub>2</sub>-e.<sup>3</sup>

The built environment will be integral to SA's transition to a circular economy. A circular economy recognises the true value of resources and materials and aims to keep products and materials at their highest value for as long as possible to reduce the amount of virgin material that is needed. It incorporates aspects like original product design, sharing, repair, re-use and, only after these higher value steps, recycling, and resource recovery. By keeping these materials circulating, there is the additional benefit of reduced reliance on virgin materials (which can be accompanied by land clearing

---

<sup>1</sup> South Australia's Waste and Resource Recovery Infrastructure Plan, Green Industries SA 2018

<sup>2</sup> South Australia's Waste Strategy 2020-2025, Green Industries SA 2020

<sup>3</sup> Green Industries SA, Circular Economy Resource Recovery Report 2021-22.

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037  
(02) 8746 5000  
[INFO@WMRR.ASN.AU](mailto:INFO@WMRR.ASN.AU)

**WMRR.ASN.AU**



and loss of biodiversity), as well as reducing carbon and methane emissions, which will be key to also meeting 2030 carbon commitments of 43% reduction on 2005 levels.

The Greater Adelaide Region Plan needs to include clear recognition that with the proposed population growth and increase in urban areas there will be an accompanying increase in waste material, including hazardous wastes, which have no potential for beneficial reuse, and that the well-planned provision of suitably located facilities for the collection, aggregation, processing, treatment and disposal of such wastes is essential for both the environment and the continued operation of industry. The development of such facilities requires appropriate planning (land use and transportation) as well as buffers, given that there can be high levels of sensitivity to encroachment. In WMRR's view, the Plan urgently needs to recognise that the WARR industry provides essential services to the community, in the same manner as other forms of infrastructure are referenced.

The criticality of the WARR sector has been tragically highlighted by natural disasters and the pandemic in recent years. These have resulted in the creation of large volumes of waste needing removal and differing disposal treatments at scale. Strategic planning that includes the recognition of both business-as-usual growth as well as these types of surges needs to occur, to ensure there is resilience across WARR networks and help protect the accessibility and useability of infrastructure. It is vital that the SA Waste and Resource Recovery Infrastructure Plan and the Waste Strategy be incorporated into this plan and echo connected sentiments, given the vital role that this Plan plays in establishing and supporting the continued growth of Greater Adelaide to ensure that it does remain a liveable city.

The importance of waste and recycling services and the need to consider this in initial design and strategic planning is too important to leave to the goodwill or ad hoc approach of individual developers, councils and projects. It requires a systems level approach to be effective and safeguard the minimum standards the WARR industry needs to deliver its services to the Greater Adelaide community.

WMRR's responses to the consultation questions can be found at **Annexure A**. Please contact the undersigned if you wish to further discuss WMRR's submission.

Yours sincerely

Gayle Sloan

**Chief Executive Officer**

Waste Management and Resource Recovery Association of Australia

**WMRR NATIONAL OFFICE**  
57 ST JOHNS ROAD  
GLEBE NSW 2037

(02) 8746 5000  
INFO@WMRR.ASN.AU

**WMRR.ASN.AU**

**Submission:**

<p>What do you think of the four (4) outcomes guiding how Greater Adelaide should grow?</p> <p>Are there any other outcomes the commission should consider?</p> <p>What other major trends and drivers might shape the future of Greater Adelaide? How should a land use plan address these trends and drivers?</p>	<p>Adelaide has a terrific opportunity to ensure that it remains a liveable city to live, work, play and stay, by focusing on its natural environment and continuing to build on its strong planning foundations including land use and considered transport networks. An increased emphasis on reducing carbon emissions by preferencing local recycled materials, managing materials close to generation (the proximity principle) and planning resource recovery precincts to keep material out of landfill and reduce native vegetation clearing (also reducing methane emissions).</p> <p>All of the above can be assisted by a clear and specific definition of what the circular economy is, why achieving a greater level of circularity is critically important and how planning and development processes and outcomes play a key role in achieving circularity need to be incorporated into the plan.</p> <p>WARR infrastructure like power, water, sewer and social infrastructure needs to be planned for at the outset with our spatial footprint located throughout the region that it serves. It is not appropriate to 'push the industry out' (proximity principle), into the regions without adverse commercial and carbon impacts. Further by doing so, it negates the opportunity to create resource recovery/ recycling hubs that enable the creation of secondary material to use in local manufacturing and create local SA jobs.</p>
<p>What else could the Greater Adelaide Regional Plan do to contribute to a greener, wilder and climate resilient environment?</p>	<p>As well as the elements mentioned above (e.g. the use of recycle in the built environment, reducing land clearing and reliance on virgin material as well as carbon and methane emissions), the plan should recognise the relationship between design and construction of built form to future generation of waste and the role that the built environment sector can play in reducing the future generation of waste, amount of embodied energy and carbon emissions.</p> <p>The plan could promote design requirements that drive the prioritised use of recovered materials in buildings and infrastructure as well as future reusability and recoverability. Recovered materials need markets for their use in a circular economy while design and material choices determine the</p>

	flexibility of buildings for greater longevity and the ability for their components to be recovered at end of life.
What else could the Greater Adelaide Regional Plan do to contribute to a more equitable and socially cohesive region?	<p>The Plan could be a blueprint for equitable and consistent management of WARR material by clearly identifying at a strategic level the land use precincts where WARR facilities could be developed that service the Region equally, and also by establishing clear planning guidance as to the standards required to be complied with statewide, for all built environments and roads/ streets to gain equal access to collection services. This would support collection logistics through building and transport network design requirements. Subdivision design, road widths and traffic flows need to support the ready movement of waste and resource recovery trucks – both for standard households and once aggregated for long-haul transport to key large scale facilities. The availability of adequate space in buildings for the separation and storage of materials is critical to enabling the sustainable management of waste and resources.</p> <p>The plan could improve policy support with specific reference to ‘living’ documents for good design outcomes to support waste and resource recovery outcomes. Specific policy for other forms of development, such as residential, retail, office, medical/consulting room, education and community uses should be referenced in strategic and statutory policy but could exist in standalone policy documents which can be updated outside of Strategic Planning and Code Amendment process.</p>
What else could the Greater Adelaide Regional Plan do to contribute to a strong economy built on a smarter, cleaner, regenerative future?	Establishment of suitable zoning to support more resource recovery and circular economy hubs. There are significant employment and economic benefits from co-locating different WARR infrastructure together (as occurs in the Wingfield precinct for example) and this could be further driven with planning for circular economy hubs, where manufacturers who can reuse materials or use recycled materials, are supported to co-locate given that the recovered materials will act as inputs into their processes.
What else could the Greater Adelaide Regional Plan do to encourage the delivery of greater choice across housing types and locations?	<p>Initial planning and design must consider resource consumption in both the physical design of buildings and public infrastructure and the materials they consume but also the day-to-day life of communities and the choices they make.</p> <p>Aspects like encouraging public and active transportation, easy access to community facilities like repair cafes, share libraries,</p>

	salvage shops and recycling facilities (container deposit scheme drop-offs, hazardous household waste disposal points etc.) are needed to maximise the use of resources, but they also foster community connectiveness and capacity building- essential elements to building strong communities.
What neighbourhood features enhance living and working locally?	<p>Current strategic and statutory policy positioning offers no material support for development which facilitates reduced consumption/ reuse or recycling. At present policy relating to residential development is typically focussed on the direct logistics of waste collection but offers little policy support for outcomes which reduce waste generation in the first place.</p> <p>The built environment has enormous amounts of embedded materials and energy. The current system of demolition and downgrading materials takes additional energy and loses much of the embedded value in those materials. Retaining the value of these materials in their current form can be encouraged through modular design and building techniques that allow for de-construction and reuse. De-construction will also allow items that cannot be reused to be separated more easily so they can be recovered into higher grade products (instead of mixed materials).</p>
How can infill development achieve an urban form that is consistent with the principles of Living Locally? What do you see as the benefits and potential drawbacks of infill development?	It is vital that infill development maintains character and amenity, and where possible can be done with minimum disruption, yet meet the requirements of liveability including open space, energy efficiency and climate considerations. Ideally vertical development can be used that will enable green space and tree canopy to be maintained, as well as an increased emphasis on using recycled material and ensuring that appropriate WARR collection infrastructure can be both enhanced and serviced. WMRR seeks that guidance materials produced for Green Industries SA, such as the Better Practice Guide for Waste Management in Residential & Mixed Use Developments (2014), be utilised.
Where is the next generation of strategic infill sites?	Ideally the next generation of infill sites will be located adjacent to existing transport and community infrastructure (referenced as established urban area) to avoid further sprawl and the need for further large infrastructure investment. As such, WARR infrastructure needs to be located where it can continue to efficiently service its community and enable further investment.

	<p>To this end, existing facilities need to be appropriately protected from encroachment by future development, particularly the creation of additional sensitive receivers, to avoid interface issues arising. This needs to include maintenance of the separation distances recommended by the EPA through zoning to prevent environmental interface issues (such as noise, dust, traffic or odour) arising due to land use changes.</p> <p>Planning needs to establish suitable locations for new infrastructure, including those which generate impacts to be located, convenient to the communities they serve and their logistic pathways. As Adelaide grows, there will be a need for new transfer stations and resource recovery facilities to ensure that communities have access to efficient and accessible waste and resource recovery services.</p>
What are the most important factors for the Commission to consider in meeting future demand for employment land?	Affordable housing to ensure that these precincts have a pool of workers that can access the employment land.