



Mr Craig Holden
Chair
State Planning Commission
GPO Box 1815
Adelaide SA 5001
By email: plansasubmissions@sa.gov.au

4 November 2024

Dear Mr Holden

Re: Greater Adelaide Regional Plan (GARP)

Thank you for the opportunity to provide feedback on the State Planning Commission's draft *Greater Adelaide Regional Plan* (GARP). The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$17 billion waste and resource recovery (WARR) industry. With more than 2,330 members from over 410 entities nationwide, we represent the breadth and depth of the industry, being representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. In South Australia (SA), WMRR represents over 250 individual members from more than 45 entities. The state generates 5.35 million tonnes of waste each year with a resource recovery rate of 80% delivering an economic value of \$1.37 billion employing 4,410 South Australians.

As noted in WMRR's November 2023 submission to the Department for Trade and Investment SA on the GARP Discussion Paper, the importance of waste and resource recovery including 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 and the community needs, to deliver services to the Greater Adelaide community.

As such WMRR has taken the opportunity to build further from the November 2023 submission on the GARP discussion paper, to provide concise views on selected elements of the draft Plan in respect of waste management, resource recovery and circular economy, please see below.

i. Inclusion of Waste and Resource Recovery Section

WMRR warmly welcomes that the GARP includes a specific section in respect of waste management and resource recovery, and that the content of this section recognises the importance of a transition to a circular economy, the role of the built environment in contributing to carbon emissions and waste generation and the contribution of the sector to the economy. This inclusion is a material improvement from the previous strategic documents' very limited focus on our industry and its importance.

ii. Long-term strategic objectives

The proposed long-term strategic objectives are useful, however they also require further expansion.

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There are currently no strategic objectives proposed to ensure that all development (given all development results in the generation of waste material) should occur in a manner which supports the minimisation of waste and greater levels of circularity, which includes both designing out and greater emphasis on material selection for reuse opportunities.

The proposed long-term strategic objectives also lack reference to the protection of existing waste management and resource recovery facilities, including closed facilities, from the encroachment of other forms of development where the reverse amenity and environmental issues could result in hazards or amenity impacts.

WMRR therefore seeks improvements to these objectives to:

- reference all development occurring in a manner which minimises waste generation through the entire life cycle of the development, and which enables optimised recycling and resource recovery by occupants; and
- explicitly clarify that protection from encroachment / interface protection is required for all existing WARR facilities, including allowance for forecast expansion.

iii. Mapping & Protection of facilities from encroachment

The integration of mapping and buffer distances is a welcome addition which leverages the digital form of the GARP to provide a clear strategic reference to those facilities which warrant protection from encroachment at a strategic level.

At the present time the mapping appears to be limited to landfills, which are critical given the significant potential impacts. Landfills are, however, only one (1) component of the sector, and the spatial identification needs to extend more broadly to include all waste and resource recovery facilities with appropriate buffers depending on character (e.g. composting facilities, transfer stations, material recovery facilities, etc). All waste and resource recovery facilities are licensed by the EPA so can be readily identified.

There needs to be further clarity in the GARP around how the protections for existing facilities, applications to change land use zoning, and applications for development consider the importance of existing facilities and buffer land. As context, there are cases where encroachment of residential development to the boundary or within the regulatory buffer land has created hazards and risks. For example, housing development up to the boundary of Cranbourne landfill in Victoria caused hazards, evacuation of houses, significant disruption to families and other stakeholders and significant investigations and risk management works. Scenarios like this need to be avoided in the future.

Clarity around this process and the associated criteria would allow more objective assessment of the adequacy of the mapping. WMRR would appreciate further involvement in this as the work is advanced.

iv. People, housing and liveability

Whilst the section of the GARP addressing waste and resource recovery under 'Productive Economy' contains some inferences to the importance of these issues to the wider built environment, including objectives relating to adaptive reuse of buildings, and a statement of government commitment to explore the role of the planning system in fostering circularity, there is very little detail in this regard, and a lack of integration of principles of design for circularity in the remainder the document.

In the sections of the document relating to infill and greenfield residential development, landscape and character and biodiversity and climate change, there is minimal reference to the circular economy, design to avoid generation of waste, use of recycled (as opposed to virgin materials) during the build lifecycle and the logistical management of waste.

WMRR seeks that in the sections relating to infill and greenfield development, additional commentary / objectives be included to ensure that adequate provision is required to be made for the storage, collection, aggregation and processing of materials in proximity to their sources, and not rely on transport large distances to be managed. It is important that sufficient attention is given to this topic at a strategic level as there are many subsequent practical examples where optimised material collection is impossible, or the processing of materials is inhibited or of greater cost through lack of early consideration.

Beyond consideration of these comments, WMRR seeks the opportunity to have material input into the identified future work to be undertaken on the integration of planning and circular economy, which will comprise a mix of strategy and policy work. With this future work having significance for how future sector development proposals will be assessed and circular economy opportunities arise (or be constrained), WMRR looks forward to deeper integration of the sector into planning documentation across time.

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