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DPTI



Suite 4.08, 10 Century Circuit
BAULKHAM HILLS NSW 2153

t 02 8746 5000

e info@wmaa.asn.au

w www.wmaa.asn.au

ABN 78 071 897 848

Alison Collins
Project Lead, Natural Resources and Environment
and Integrated Movement Systems Policy Discus-
sion Papers
Department of Planning
Transport and Infrastructure
Level 5, 50 Flinders Street
Adelaide SA 5000

Email: DPTI.PlanningEngagement@sa.gov.au

3 December 2018

Dear Ms Collins

Re: Natural Resources and Environment & Integrated Movement Systems Policy Discussion Papers

The Waste Management Association of Australia (WMAA) is the peak body for all stakeholders in the waste and resource recovery industry. We have more than 1,900 members nationally based in a broad range of business organisations, the three tiers of government, universities and NGOs. Our members are involved with a range of important waste management and resource recovery activities within the 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 residual materials.

The waste, recycling and remanufacturing industry in South Australia (SA) continues to be a significant contributor to the State's circular economy and environment. The industry contributes through:

- A turnover of over \$1 billion in South Australia¹.
- A Gross State Product (GSP) of \$500 million¹.
- Employing 4,800 full-time equivalent persons in South Australia¹.
- A reduction of greenhouse gas emissions by 1.25 million tonnes of CO₂-e in South Australia² through recycling activities

WMAA values our strong working relationship with the SA Government on a range of initiatives including the EPA Waste Reform, active participation in both the High Level Advisory Group and WMAA Branch committee Reference Group, as well as collaboration with Green Industries SA through a service level agreement. WMAA welcomes the current Government's commitment to development reform and the circular economy in SA and trusts that this commitment will continue by way of tangible action and funding support. The association has a strong interest in the planning and development field, engaging with a variety of stakeholders to look at issues and challenges of planning for infrastructure in SA and the 'not in my backyard' phenomenon when it comes to managing the wastes we produce. WMAA SA members were also involved in the development of the Better Practice Guide Waste Management for Residential and Mixed Use Developments in SA.

¹ RWA, Review of South Australia's Waste Strategy 2011-2015, February 2014

² GISA SA 2016-17 Recycling Activity Survey

The WMAA membership comprises a broad range of interests in the sector and this response focuses on our shared position as an association. WMAA supports the transitioning of effective policy, recognizing waste and resource recovery as an essential service for developments as per services for water, electricity and gas.

It is noted that the key policies of 'Integrated Movement Systems' and 'Natural Resources and Environment' appear to have omitted the role our industry provides in relation to the outcomes sought. Urban and infrastructure design are critical elements that act to either support or constrain our industry's ability to provide efficient and effective resource recovery. There is no reference to the State-developed document, 'Better Practice Guide for Waste Management in Residential & Mixed Use Developments (2014)' by Green Industries SA (GISA) and the Property Council of SA. This document is used as a planning tool to achieve key design objectives as intended by the planning reform.

Further, the planning reform as it stands, omits the recognition of risk and conflict with community (pedestrian, mobility impaired, bicycles, and vehicle traffic) in the servicing of developments. Any urban development, no matter the scale, requires services in the form of inputs and outputs. From a commercial perspective, these inputs and outputs are in the form of commercial vehicles ranging from light fleet (SRV) to larger plant. Within our industry, the minimum size of the vehicles utilised are the Medium Rigid Vehicles (MRV) of minimum length of 8.8metres, which require line of sight and minimal reversing (noise impacts and safety). The design of the urban environment requires infrastructure that is inclusive of the nature- size and weight - of these vehicles, and their interaction in the public realm in servicing developments (commercial and residential). Planning design needs to include the mitigation of risks associated with the interaction of services in the community.

In WMAA's view, the current planning regime in SA leads to increased collection frequencies, lost efficiencies and greater impact by heavy vehicles on civil infrastructure is welcome. Further, the current situation creates a financial burden for building owners by way of increased costs over the operational life of the building, which could easily be avoided with better planning and design. WMAA considers that there is an enormous opportunity to encourage leading waste and resource recovery practice in SA's planning design that will underpin SA's economic transition to a circular economy with resource recovery and integrated movement systems, if the new regime successfully incorporates the work mentioned above as well as GISA's Circular Economy research.

The urban environment is creating growing complexity for our industry; as noted in the Federal Government's National Waste Policy, waste generation is growing exponentially in both volumes per capita and in the complexity of material composition. As industry, both in SA and nationally, transitions to a circular economy, there will be increased movements and greater source separation of materials for collection in the community, especially with the increased consumption of newer technologies such as e-waste and batteries for home energy generation. Material flow of these streams must be considered for recovery at end-of-life, from safe storage on-site to collection pathways. It is critical that urban design includes material flows and pathways for delivery, temporary storage (end-of-life), and collection.

While WMAA supports the State's planning reform in principle, there are genuine concerns related to the omissions raised in our submission. We welcome the opportunity to discuss our feedback in greater detail. Thank you for your consideration of WMAA's response to the planning reform. Please do not hesitate to contact the undersigned if you have any queries about our submission.

Yours sincerely



Gayle Sloan
Chief Executive Officer
Waste Management Association of Australia



John Phillips OAM
SA Branch President
Waste Management Association of Australia