Dear DPTI Planning Engagement

Green Industries SA (formerly Zero Waste SA) offers the following feedback and suggestions on the Draft Planning and Design Code currently out for consultation.

**Incorporate a Specific ‘Waste and Recycling’ Overlay**

Provision of appropriate waste management and recycling services should be viewed as an essential service in the same way as other utilities to ensure the health, safety and amenity of an area is retained. The 20 Year State Infrastructure Strategy Discussion Paper released by Infrastructure SA in June 2019 recognises the utility services of power, gas, water and waste management are fundamental to the liveability of a community. Ensuring they are affordable and reliable is not only a social issue but also important for the economic development of South Australia.

Waste materials requiring appropriate management will be generated wherever human beings are. The management of waste is currently not explicitly addressed in the same way as other environmental issues like energy and water in the form of an overlay in the Draft Planning and Design Code. We strongly suggest incorporating a ‘Waste and Recycling’ overlay to offer at least the same level of visibility as other utility overlay topics. It is noted that under the current structure ‘Historic Shipwrecks’ has much more limited application but is still treated as an overlay.

Within a Waste and Recycling overlay, provision can be made for different tiers of recycling and waste management systems, depending on type (e.g. detached dwelling, multi-unit dwelling, residential care facility, retail/commercial premises) and ensure that the design allows for adequate space for segregated waste and recycling streams in line with systems provided by local government and to support objectives in South Australia’s Waste Strategy. The design and development of these systems should enable residents and/or tenants to safely and conveniently move materials from within buildings to segregated waste and recycling collection points, as well as enabling sufficient and safe access for a range of collection vehicles, depending on whether they are lifting 240 litre bins or much larger bins, in the case of communal systems.

In 2014, Zero Waste SA published the *Better Practice Guide for Waste Management in Residential & Mixed Use Developments*, or the ‘MUDs’ Guide, which was developed with Renewal SA and the Property Council of Australia and jointly released by the Minister for Sustainability, Environment and Conservation, and the Minister for Planning.

Based on instances we are aware of where multi-unit residential developments were built, but omitted systems that enabled effective collection of waste and recycling from the design, we strongly suggest incorporating relevant elements of this guide in a standalone ‘Waste and Recycling’ Overlay in both the Urban and Rural sections of the code.

In particular, waste and recycling management system design in higher density developments should ensure collection vehicles have sufficient overhead clearance for trucks to lift bins.

If an overlay covering waste and recycling is not developed, the amendments proposed in Attachment 1 for the text in Phase Two (Rural Areas) are the minimum recommended revisions to the Performance Outcomes (PO) and Deemed to Satisfy / Designated Performance Feature (DTS / DPF) in relation to waste and recycling management.

**Recycling and Waste Management as Essential Utilities**

China’s National Sword policy decision, and consequent Federal, State and local government efforts to bolster Australia’s on-shore recycling and reprocessing capacity, means that provision and protection of appropriate land for recycling, commercial composting and materials recovery facilities is a greater priority than ever.

Extracts from a submission by Waste Management and Resource Recovery Association of Australia (WMRR) to the Infrastructure SA Discussion Paper in July 2019, include considerations required for development within any buffer zone of existing infrastructure and align with Green Industries SA position in this regard.

“In siting and operating waste and resource recovery facilities, the availability of land with adequate buffers and protection of those buffers throughout the operating life of these facilities are important.

“Additionally, as it is cost prohibitive for most operators to own the required buffers, incompatible development may occur in the buffer zones.

“...new applications for sensitive land uses within the buffer to demonstrate that they will not be impacted by existing operations, or at the very least acknowledge and accept that on occasion, their amenity may be impacted and that they waive any rights to action in this regard.”

Although the section on Waste Treatment and Management Facilities (p1702) mentions separation distances (PO 1.1), the section on Organic Waste Processing Facilities (p1704) doesn’t specifically mention separation from sensitive uses.

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For both activities, just as there needs to be a requirement that prevents such facilities impacting on existing sensitive uses (PO 6.2 and PO 7.3) along with prescribed separation distances as recommended by the Environment Protection Authority, **residential and other sensitive development should not be permitted to encroach on existing processing facilities**, which represent millions of dollars in infrastructure investment in essential utilities for the city and state. We recommend including the following Performance Outcome:

**PO 7.6** Sensitive uses are not to encroach on existing waste management and processing facilities, and development should proceed in accordance with the Environment Protection Authority's recommended separation distances, taking into account whether the existing activity is covered, or open air.

Green Industries SA requests a meeting with relevant staff at DPTI Planning Engagement or the Planning Reform Team to discuss the submission in regard to Phase Two (Rural Areas) further, and to provide support for developing a Waste and Recycling Overlay.

For further information or clarification and to set up a meeting, please contact Sharon Ede, Senior Adviser, Strategy, Policy & Programs on [Redacted] or at [Redacted].

Yours sincerely

[Signature]

Ian Harvey
A/Chief Executive
GREEN INDUSTRIES SA

26 November 2019

**Attachment 1:** Proposed text amendments to Phase Two (Rural Areas) if a Waste and Recycling Overlay is not developed
Attachment 1:

Proposed text amendments to Phase Two (Rural Areas) if a Waste and Recycling Overlay is not developed

The below amendments are provided for Phase Two (Rural Areas) however may also apply to equivalent sections of Phase Three (Urban Areas), which is subject to a separate consultation process.

In the recommended changes outlined below, additional text is in bold and text to be removed is struck though.

(p1600 – p1601) Site Facilities / Waste and Recycling Storage and Access

PO 12.1 Development provides dedicated area for on-site collection and storage sorting of segregated recyclable materials, and refuse landfill waste, green-organic waste and wash bay facilities for the ongoing maintenance of bins and any associated equipment (eg. balers, compactors, wash bay facilities) that is adequate in size considering the number and nature of the activities they will serve and the frequency of collection.

PO 12.2 Communal waste and recycling storage and collection areas located, enclosed and designed to be screened from view from the public domain, open space and dwellings.

PO 12.3 Communal waste and recycling storage and collection areas designed to be well ventilated and located away from habitable rooms.

PO 12.4 Communal waste and recycling storage and collection areas designed to allow waste and recycling collection vehicles to enter and leave the site without reversing, and where applicable, to ensure enough overhead clearance to allow trucks to lift bins.

PO 12.5 For mixed use developments, non-residential waste and recycling storage areas and access should enable food and other organic waste to be segregated for provide opportunities for on-site management of food waste through composting or other waste recovery as appropriate.

PO 12.6 Safe and convenient accessibility and manoeuvrability of bins to the designated collection point for users (including the elderly and disabled), and waste collection staff and vehicles.

(p1609) Waste and Recycling Storage and Access

PO 24.1 Provision is made for the convenient storage of segregated waste and recycling bins in a location screened from public view.

DTS / DPF 24.1
Dwellings are provided with:
(a) an area of 3m² or more for the storage of segregated waste and recycling bins (separate from any designated car parking spaces or private open space) is provided behind the building line; and
(b) a continuous unobstructed path of travel with a minimum width of 800mm between the waste and recycling bin storage area and the street.

(p1614) Site Facilities / Waste and Recycling Storage and Access

PO 35.3 Provision is made for suitable household waste and recyclable material storage facilities conveniently located away, or screened, from public view.

PO 35.5 Provision is made for on-site waste and recycling collection where 10 or more bins are to be collected at any one time including enabling collection vehicles to enter and leave the site without reversing, and where applicable, to ensure enough overhead clearance to allow trucks to lift bins.

(p1616) Site Facilities / Waste and Recycling Storage and Access

PO 39.4 Provision is made for suitable household waste and recyclable material storage facilities conveniently located away, or screened, from public view.

PO 39.6 Provision is made for on-site waste and recycling collection where 10 or more bins are to be collected at any one time including enabling collection vehicles to enter and leave the site without reversing, and where applicable, to ensure enough overhead clearance to allow trucks to lift bins.

(p1629) Waste and Recycling Storage and Access

PO 18.1 Provision is made for the convenient storage of segregated waste and recycling bins in a location screened from public view.

DTS / DPF 18.1 Dwellings are provided with:
(a) an area of 3m² or more for the storage of segregated waste and recycling bins (separate from any designated car parking spaces or private open space) is provided behind the building line; and
(b) a continuous unobstructed path of travel with a minimum width of 800mm between the waste and recycling bin storage area and the street.

(p1631-32) Site Facilities / Waste and Recycling Storage and Access

PO 24.3 Provision is made for suitable household waste and recyclable material storage facilities conveniently located away, or screened, from public view.

PO 24.5 Provision is made for on-site waste and recycling collection where 10 or more bins are to be collected at any one time including enabling collection vehicles to enter and leave the site without reversing, and where applicable, to ensure enough overhead clearance to allow trucks to lift bins.

(p1633) Site Facilities / Waste and Recycling Storage and Access

PO 28.4 Provision is made for suitable household waste and recyclable material storage facilities conveniently located away, or screened, from public view.
PO 28.6 Provision is made for on-site waste and recycling collection where 10 or more bins are to be collected at any one time including enabling collection vehicles to enter and leave the site without reversing, and where applicable, to ensure enough overhead clearance to allow trucks to lift bins.

(p1644-1645) Waste and Recycling

PO 16.1 Provision is made for the convenient storage of segregated waste and recycling bins in a location screened from public view.

DTS/DPF 16.1 Dwellings are provided with:
(a) an area of 3m² or more for the storage of segregated waste and recycling bins (separate from any designated car parking spaces or private open space) is provided behind the building line; and
(b) a continuous unobstructed path of travel with a minimum width of 800mm is provided between the waste and recycling bin storage area and the street.

PO 16.2 Residential apartment buildings provide a dedicated area for the on-site storage of segregated waste and recyclable material which is:
(a) easily and safely accessible for residents and for collection vehicles;
(b) screened from adjoining land and public roads; and
(c) of sufficient dimensions to be able to accommodate the waste and recyclable material storage needs of the development considering the intensity and nature of the development and the frequency of collection.

Please note: where an area of 3m² or more is referenced (for example DTS / DPF 24.1; DTS / DPF 18.1; DTS / DPF 16.1) it is unclear if this provision is for each dwelling or the development overall. The configuration of bins and space required is dependent on the number of households in the development. It may be that the storage area needs to accommodate larger mobile or skip bins.