

16 January 2017

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Dear Sam

Re Waste Hubs Framework Consultation

Thank you for speaking with me last week and the offer to accept a late submission on the 'Waste Hubs Framework' consultation.

The Australian Landfill Owners Association (ALOA) participated in the development of the SWRRIP and supports the 'hub and spokes' planning approach adopted.

This approach to regional waste planning is essential to promote better design and utilisation of facilities – especially landfills and material processing infrastructure – where the scale of the unit is important. In practice this means the planning process can move towards an efficient number of 'hub' facilities that offer better site location, material access, long term use and (because of economy of scale) lower cost.

As a result, ALOA believe it is useful to maintain the 'hub' designation in planning decision making.

In respect to the other question detailed in your consultation paper our responses are detailed below:

1. Are there existing examples of a hubs approach being employed elsewhere for waste and resource recovery or other sectors?

Yes, the concept of planning around infrastructure (hubs) is common in other states, especially for landfills and transfer stations.

2. If hubs are conceptually useful do they require formalising more widely than the State Infrastructure Plan and Regional Implementation Plans, for example in the Victorian Planning Provisions?

Yes, it is important that Victorian Planning Provision recognise the importance of a 'hub' to the wide community. and as such protect any buffers that may be in place

3. How should hubs be defined, by volume of materials or function in the waste system, or a combination of both?

We suggest by function as a 'hub' landfill in East Gippsland may receive 20,000 tonnes per annum whilst a 'hub' landfill in Melbourne may receive 1,000,000 tonnes per annum.

4. Should matters other than a hub's role in the waste system be determinative of its designation as a hub? For example, community concerns or expectations.

No, a hub facility, by its very nature, will need to meet all of its licensing obligations, and so these will need to be addressed for the facility to be permitted.

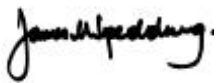
5. Are the objective and outcomes clear and deliverable?

Under SWRRIP the hub and spoke approach is clear and deliverable over time. Further, ALOA believes this will contribute to improved environmental protection.

6. For the purposes of developing a framework, should it consider hubs and spokes as indivisible and of equal importance? Or are there issues for either aspect which warrant particular attention

We believe the focus should be on the definition of what is a 'hub', as this will be the long-term facility that will underpin this planning approach.

I trust this response is useful but please contact me if you have any queries or would like me to call by for a more detailed discussion.



Max Spedding
CEO ALOA