

## Planning Implementation (DELWP)

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**From:** contact@engage.vic.gov.au  
**Sent:** Tuesday, 24 December 2019 12:41 PM  
**To:** Planning Implementation (DELWP)  
**Subject:** New Form submission on Planning for Melbourne's Industrial and Commercial Land



### **New Form submission on Planning for Melbourne's Industrial and Commercial Land**

Hi planning.implementation@delwp.vic.gov.au

There has been a submission on [Planning for Melbourne's Industrial and Commercial Land](#) through Engage Victoria

A copy of the submission is provided as below:

#### **Planning principles and strategies for employment land.**

The draft Melbourne industrial and commercial land use plan includes principles and strategies to guide planning for industrial and commercial land. (page 32).

**Do you think the principles and strategies provide enough clarity and guidance to assist planning for industrial and commercial land?**

No

**If no, please let us know why and how they could be improved.**

The importance of waste and resource recovery as valued industrial infrastructure could be elaborated on.

### **Criteria to identify regionally-significant industrial precincts.**

Plan Melbourne identifies state-significant industrial precincts. The draft Melbourne industrial and commercial land use plan identifies regionally-significant industrial precincts and includes criteria used as the basis to identify these locations (page 34).

### **Do you support the criteria developed to identify regionally-significant industrial precincts?**

Yes

### **If no, please let us know why and how they could be improved.**

The plan could also leverage off the Statewide Waste and Resource Recovery Infrastructure Plan - Hubs concept.

### **Purpose for regionally-significant industrial precincts and local industrial precincts.**

Plan Melbourne outlines a purpose for state-significant industrial precincts. The draft Melbourne industrial and commercial land use plan identifies a purpose for regionally-significant industrial precincts and local industrial precincts (page 35).

### **Do you support the purpose developed for regionally-significant industrial precincts and local industrial precincts?**

Yes

**If no, please let us know why and how they could be improved.**

### **Developing local industrial land use strategies.**

Appendix 2 of the draft Melbourne industrial and commercial land use plan proposes guidance for developing local industrial land use strategies.

**Do you have any comments or suggestions to improve the guidance for developing local industrial land use strategies?**

See letter attached. - The plan could also leverage off the Statewide Waste and Resource Recovery Infrastructure Plan - Hubs concept.

### **Key industrial and commercial areas.**

The draft Melbourne industrial and commercial land use plan identifies and describes key industrial and commercial areas for each of the six metropolitan regions (refer to Part B of the plan).

**Have the key industrial and commercial areas been adequately identified and described across the regions?**

No

**If no, please let us know which other area we should identify or how the areas can be**

**better described.**

See letter attached.

**Would you like to comment on any other aspects of the plan?**

See letter attached.

**If you would like to upload a submission, please do so here.**

[REDACTED]

**I am making this submission:**

on behalf of an organisation

**Email address (Optional)**

[REDACTED]

**I agree to receive emails about my submission if required or project updates.**

Yes

## **Privacy Statement - Draft Melbourne Industrial and Commercial Land Use Plan**

**What we will do with your submission**

The Department of Environment, Land, Water and Planning (DELWP) is committed to protecting personal information provided by you in accordance with the principles of the Victorian privacy laws. The submission you provide to DELWP will be used to inform the finalisation of the Melbourne Industrial and Commercial Land Use Plan.

The information you provide will be made available to DELWP to develop a consultation report. This report will be uploaded to the Melbourne Industrial and Commercial Land Use Plan page on the DELWP website.

The contact information you provide may be used to contact you should we need to clarify your submission or to provide you with project updates.

The submission you provide will be published on the DELWP website. To protect individual privacy, DELWP will remove your name and address from your submission when we receive it.

If you do not wish to be identified, please ensure there is no other information in your submission that could identify you or other individuals.

If you are making comment as an organisation, then your comments may be published, including the name of your organisation.

De-identified submissions may be used by DELWP, or its contracted service providers under confidentiality agreements, in preparing its recommendations to government.

Please note, if you do not provide your name/email address we will not be able to identify your submission if you wish to access it, make a correction, or require technical support.

Should you need to correct the information you provided or gain access to your submission, please contact us via email at [planning.implementation@delwp.vic.gov.au](mailto:planning.implementation@delwp.vic.gov.au)

**I agree to the privacy statement**

yes

To view all of the form's submissions, visit:

<https://engage.vic.gov.au/index.php/dashboard/reports/forms/viewDetail/2373>

Regards,

The Engage Victoria Team

This is not SPAM. You are receiving this message because you have submitted feedback or signed up to Engage Victoria. If you think you have been sent this by mistake please contact us at [contact@engage.vic.gov.au](mailto:contact@engage.vic.gov.au).

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24 December 2019

Planning Implementation  
Department of Environment, Land, Water and Planning  
PO Box 500  
East Melbourne, Victoria 3002

To whom it may concern,

**RE: Planning for Melbourne's Industrial and Commercial Land – (Industrial and Commercial Land Use Plan – 2019)**

Sustainability Victoria (SV) has reviewed the Industrial and Commercial Land Use Plan 2019, and makes the following comments to assist in the review:

**Context**

In order to provide some context to our submission, we provide the following background information. SV's statutory objective is to facilitate and promote environmental sustainability in the use of resources. Established under the Sustainability Victoria Act 2005, SV is a statutory authority with a board appointed by the Minister for Environment and Climate Change.

Under the 2014 amendments to the *Environment Protection Act 1970* (EP Act), SV is responsible for preparing the Statewide Waste and Resource Recovery Plan (SWRRIP). It is the key Victorian Government document in the *Victorian Waste and Resource Recovery Infrastructure Planning Framework* (Framework), also established under the EP Act. The SWRRIP's Vision, Purpose, Goals and Strategic Directions set the broad approach for the seven Regional Waste and Resource Recovery Implementation Plans (Implementation Plans), including their infrastructure and landfill schedules. The SWRRIP was initiated as it was seen there was a need for more sustainable waste management.

In January 2018, China introduced its National Sword Policy. The policy limits the export of low-quality mixed recyclables, including paper and plastic. This policy change has had a significant impact on recycling industries and markets around the world. The impact of a reduced export market and the complexities in developing viable end markets for recycled materials has shown that Victoria has insufficient infrastructure to manage recycling locally. Industrial land uses that process recyclables, in particular: plastics, glass, paper and cardboard, should be further considered as valued and needed land uses within the industrial sector.

**Hazardous waste**

The Environment Protection (Industrial Waste Resource) Regulations 2009, establish a system of controls over the management of industrial and hazardous wastes (called prescribed industrial wastes). Hazardous waste management is also part of Victoria's waste and resource recovery system. SV's initial research has indicated that additional hazardous waste infrastructure will be required in order to ensure the state has adequate capacity to manage these materials.



For this reason, SV has been investigating the management of hazardous waste in Victoria with the aim to prepare a Hazardous Waste Management Infrastructure Plan.

### **Organics**

The SWRRIP and many of the Regional Waste and Resource Recovery Implementation Plans, list organics as a priority material for greater recovery. This, together with, *The Victorian Organics Resource Recovery Strategy* (Sustainability Victoria, 2015), which aims to increase the recovery and processing of organic materials, and *The Victorian Market Development Strategy for Recovered Resources* (Sustainability Victoria, 2016), which also lists organics as a priority material, all indicate a clear direction to increase the recovery of organics. The Metropolitan Waste Resource Recovery Group (MWRRG) has developed a comprehensive guide to help councils design, implement and maintain an effective food organics and garden organics (FOGO) service. SV's research indicates that in June 2016, 11 councils initiated a FOGO service and by June 2017, this had increased to 14 councils and by all accounts, further uptake is expected into the future. SV is of the view that additional industrial infrastructure will be needed to meet the increase and align with the above-mentioned strategies and programs.

### **E-waste**

As you would be aware, the Victorian Government has banned e-waste from landfill, (which came into effect 1 July 2019), and developed a policy package that includes both regulatory and non-regulatory measures aimed at keeping e-waste out of landfill. There is a need for industrial infrastructure to align with the ban and ensure that there are adequate facilities to sort and process these materials. SV considers that this should be considered in the land use plan.

### **Circular economy principles in commercial and industrial land uses**

All products, materials and wastes have a life-cycle. It begins with how products are designed and manufactured, distributed, used, and then reused or recycled. Each stage offers opportunities to think about how products and materials can be managed more sustainably.

### **Land use synergies**

Land use synergies (sometimes referred to as clusters and co-location or agglomeration economies) can improve efficiencies and the sustainability of uses and materials. For example, businesses manufacturing bottles could use plastic wastes generated by industry, and composting facilities can process organics wastes generated from food manufacturing. Where these uses are sited within proximity, this can encourage industry to work in synergy and save money and resources on transport costs. This could be encouraged through policy and can also be achieved by working with industry groups and associations, or by reviewing relevant Waste and Resource Recovery Group Implementation Plans, which list waste and resource recovery processors in the relevant region. For example, Dandenong East in Melbourne's eastern suburbs, is becoming a precinct for plastics, with materials recycling facilities, plastics processing and manufacturing all being located in the vicinity.

For an example of a program assisting to create synergies and to reduce associated waste costs for business see: The Advisory System for Processing, Innovation & Resource Exchange Pty Ltd (ASPIRE) <https://aspireme.com/home/what-is-aspire/>

Policy that encourages and facilitates circular economy principles and industrial synergies could be further explored. As you would be aware, DELWP has recently consulted on the Circular Economy Issues Paper 2019 and the outcome of this consultation is expected into 2020. Therefore, there may be an opportunity to align the planning study with the circular economy principles where appropriate.

### **Waste to Energy**

Waste to Energy (WtE) is also emerging as a more sustainable way to management residual waste than sending it to landfill. It is also important to consider the waste hierarchy (*Environment Protection Act 1970*) in the assessment of WtE, which is lower in the wastes hierarchy than recovery. As such, the benefits from WtE are best realised when the feedstock is a material stream or waste that cannot viably be recovered for higher order recovery, that is, for reuse or recycling. SV acknowledges the question of *'what policies are needed for renewable energy use and related development'*? While the state does currently not have a WtE policy, it is considered that the outcome of the *Circular Economy Issues Paper* into 2020, may assist further with this.

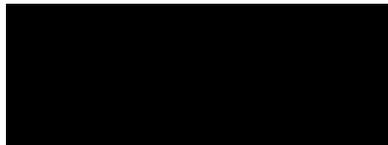
### **Summary**

In summary, SV considers that the industrial component should align with emerging waste streams and relevant strategies. This would also be linked with the changing economy and the move towards a more circular economy. We acknowledge that the land use plan mentions waste management services are part of the industry landscape; however, SV considers the importance of this should be elaborated on. Consideration should be given to acknowledge the need for industrial infrastructure to manage the following:

- Recyclables
- Organics
- Hazardous waste
- E-waste

I hope this submission has been useful. If you have any queries or require additional information, please contact me [REDACTED]

Yours sincerely



Project Lead – Land Use Planning