



11 September 2017

Mr Carl Muller  
Acting Chief Executive Officer  
Sustainability Victoria  
Level 28, Urban Workshop  
50 Lonsdale Street  
Melbourne VIC 3000

Ask for: Kathleen McClusky  
Phone: 9932 1004  
Our Ref: A2690230

Dear Mr Muller,

**Amendments to the Statewide Waste and Resource Recovery Infrastructure Plan**

I write in response to your letter seeking Council's feedback on the amendments made to the Statewide Waste and Resource Recovery Infrastructure Plan (SWRRIP). Council appreciates the opportunity to provide a response and looks forward to working closely with the Victorian Government to finalise the plan, develop an implementation plan and be actively involved in the process.

Council understands that the main purpose of this amendment is to incorporate key information identified in the seven Regional Waste and Resource Recovery Implementation Plans and to ensure statewide directions reflect regional infrastructure needs and priorities.

Council's submission highlights the importance of the integration of land use planning and waste and resource recovery infrastructure planning; specifically that it is critical to engage with communities that are or may be affected by waste and resource recovery activities at the establishment and ongoing operations of the facilities.

If you wish to discuss this submission further, please contact Kathleen McClusky, Acting Director Strategic Development on 9932 1004 or email [kmclusky@hobsonsbay.vic.gov.au](mailto:kmclusky@hobsonsbay.vic.gov.au).

Yours sincerely,

Chris Eddy  
Chief Executive Officer



## **Submission to amendments of the Statewide Waste and Resource Recovery Infrastructure Plan**

Council has been actively involved in the development of the Metropolitan Local Government Waste Forum submission to the earlier Statewide Waste and Resource Recovery Infrastructure Plan (SWRRIP) and also provided a submission to Metropolitan Waste and Resource Recovery Group on draft Metropolitan Waste and Resource Recovery Implementation Plan.

Council's submission to the consultation draft of the amended SWRRIP focuses on the new chapter introduced on 'Integrated land use planning and hubs' and hubs within Hobsons Bay City Council but also those that are significant to services delivered by Council.

### **Integrated land use planning and hubs**

This new chapter in the SWRRIP provides a comprehensive overview of the link between land use planning and waste and resource recovery infrastructure planning in Victoria. It highlights the importance of the availability of sufficient suitably zoned and well-located land to support an efficient 'hubs and spokes' waste and resource recovery system. It also recognises the crucial role that buffer distances and best practice operations play for minimising off-site amenity impacts on neighbouring communities.

Council agrees that the integration of land use planning around waste and resource recovery in established areas is a complex issue. While buffers may be appropriate to prevent encroachment from incompatible uses, they are not easily applied in established areas particularly where there are sensitive uses in the surrounding area. Council seeks that a clear regulatory framework and monitoring system needs to be applied to the waste and resource recovery industry to prevent off site amenity impacts.

Council also suggests that there is also an opportunity for the amended SWRRIP to recognise the introduction of the Better Apartments Design Standards. These were implemented into the Victoria Planning Provisions in April 2017 and include a standard for provision of waste and recycling systems in apartment buildings. This is aimed at improving opportunities for recycling in higher density environments and forms part of the assessment of planning applications for apartment buildings.

### **Hubs of state significance within Hobsons Bay**

The amended SWRRIP includes updated descriptions of identified hubs of state significance. These hubs constitute facilities, or groups of facilities, that play a significant role in the recovery and/or management of material streams or waste. Council supports the goal of recovering more material and landfilling less, and acknowledges the role of waste and resource recovery facilities in delivering this, along with providing positive economic, community, public health and environmental outcomes. However it is also aware of the off site amenity impacts such land uses can generate.

A long term strategy for the provision of hubs of state significance is required to ensure waste and resource recovery operations can be located in areas unconstrained by existing uses where buffers can be protected from incompatible land uses. Consolidation of existing hubs is only appropriate where any potential off site amenity impacts can be managed to ensure they are not ongoing.

Three identified hubs of state significance that are of particular relevance to Hobsons Bay are the Brooklyn Industrial Precinct (BIP), the Owens Illinois (OI) in Spotswood and the Laverton Precinct.

#### Brooklyn Industrial Precinct (BIP)

The Brooklyn Industrial Precinct (BIP) is described in the amended SWRRIP as playing an important role in metals reprocessing and the recovery of materials from the Construction and Demolition (C&D) sector. The BIP is in the City of Brimbank, however the residential community of Brooklyn and Altona North within Hobsons Bay, is in close proximity and continues to be affected by off-site amenity impacts, particularly odour and dust resulting from some activities within the precinct. It is important to recognise that BIP is home to a range of industrial operations, and not just waste and resource recovery services, with the potential for off-site impacts.

There is no opportunity for Council to increase buffer distances to existing industrial activities in the BIP. It is vital that activities in this precinct are conducted in a manner that minimises impact on surrounding land users. Council recognises the strong advocacy efforts of the Brooklyn Community Representative Group, supported by the Environment Protection Agency (EPA), to minimise the range of off-site amenity impacts from the precinct. Council also acknowledges the progress that has been made through Brimbank City Council's Brooklyn Evolution Strategy. However, in spite of the best efforts of all concerned, negative impacts continue to affect residents within the vicinity.

The primary goal should be that Victorian Government agencies work with industry, the community and local government to facilitate and ensure operator compliance with regulatory requirements. Council seeks stronger enforcement action by the EPA and other regulatory agencies on operators who fail to meet regulatory requirements. Waste and resource recovery operations consistently unable to meet regulatory requirements protecting surrounding amenity may consider transitioning to waste and resource recovery activities more compatible with community expectations or relocation.

The amended SWRRIP outlines the process for reviewing and assessing hubs of state importance. Council looks forward to participating in the review process for BIP with the Metropolitan Waste and Resource Recovery Group, Sustainability Victoria, and other councils.

#### Owens Illinois (OI) Spotswood

The Owens Illinois (OI) Spotswood facility (otherwise known as the ACI Glassworks) falls within industrial land categorised as Core Industrial under the Hobsons Bay

Industrial Land Management Strategy 2008, and therefore be protected from incompatible uses to support its continued operation. Council has commenced a structure planning process for Spotswood which will involve an updated assessment of current and future uses of industrial land in the area. In addition the site is impacted by the Port Environs Ministerial Direction 14 that provides guidance on future land use due to the site proximity to the Port of Melbourne.

#### Laverton Precinct

The Laverton Precinct identified in the original and amended SWIRRP, encompasses areas in Laverton North, Laverton and Altona industrial areas in the Cities of Hobsons Bay and Wyndham. It is identified as a key industrial precinct for growth across all sectors, is located close to transport networks and has large parcel of affordable suitably zoned land for expansion. The precinct has the capacity to increase other compatible activities that could provide both feedstocks for additional reprocessing activities and markets for recovered materials. The amended SWRRIP recognises the need for all stakeholders to work together to achieve best practice outcomes and gain community acceptance for the ongoing functionality of the precinct; including those communities that are outside the precinct and may be affected by off site amenity impacts similar to those experienced in Brooklyn.

#### Other hubs of significance to Hobsons Bay

Other hubs that have been identified in the amended SWRRIP that provide significant waste and recycling services to Hobsons Bay community include the Werribee Landfill and the Deer Park precinct, SKM Materials Recovery Facility in Coolaroo and Veolia Organics in Bulla.

The Victorian Government has emphasised the importance of community engagement around hubs, recognising that community acceptance and trust underpins the ongoing viability of facilities, and is further reinforced by the Victorian Waste Education Strategy released by Sustainability Victoria in August 2016. The Strategy presents the idea of businesses needing to obtain a 'social licence' to operate and is defined as; the acceptance that is continually granted to a business by the local community or other stakeholders to operate.

Council agrees that businesses involved in waste and resource recovery need to secure broad community support and acceptance in order to obtain or protect their social licence to operate. The waste industry and government can obtain a social licence by engaging with local communities, gaining their trust and acceptance of operations, and involving them in infrastructure planning (Victorian Waste Education Strategy 2016, page 13).

Greater input from the EPA in land use planning is also critical to ensure these hubs maintain the best practice outcomes at all times including with new industry, infrastructure upgrades, and enforcement activities. The EPA has the knowledge and expertise to make informed decisions in relation to contaminated land, landfill Best

Practice Environmental Management (BPEM), ground water contamination, buffer requirements and amenity issues around these hubs.

### **Conclusion**

Council supports recovering more material and landfilling less, and acknowledges the role of waste and resource recovery facilities in delivering this, along with providing positive economic, community, public health and environmental outcomes. However it is also aware of the off site amenity impacts such land uses can generate. Engagement of communities around hubs is essential because community acceptance underpins the ongoing viability of facilities.

Council urges the Victorian Government to work closely with business, industry and local governments to ensure that businesses operating in the waste and resource recovery space do obtain and maintain a 'social licence'. A requirement for waste and resource recovery businesses to continually engage with affected communities should also be introduced and reinforced by the EPA. Council also seeks stronger enforcement action by the EPA and other regulatory agencies on operators who fail to meet regulatory requirements. The establishment of a clear regulatory framework and monitoring system to be applied to the waste and resource recovery industry to prevent off site amenity impacts, will go a long way to mitigate impacts and ensure compliance.

Where there is no opportunity to increase buffer distances to existing industrial activities in waste and resource recovery hubs, it is vital that activities are conducted in a manner that minimises impact on surrounding land users. Waste and resource recovery operations can be located in areas unconstrained by existing uses where buffers can be protected from incompatible land uses.