

19 December 2019

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

Via [www.engage.vic.gov.au](http://www.engage.vic.gov.au)

Dear Sir/Madam

#### **DRAFT MELBOURNE INDUSTRIAL AND COMMERCIAL LAND USE PLAN**

The Construction Material Processors Association (CMPA) is dedicated to the representation and service of its Members in the Victorian Earth Resources industry. The CMPA represents a broad spectrum of businesses that extract and process hard rock, gravel, sand, clay, lime, and soil. CMPA members also operate recycling businesses.

CMPA members are typically small to medium sized family and private businesses, local government and utilities. Many are regionally based employers and service local construction, infrastructure and road maintenance needs. The extractives sector is a key pillar within the construction industry underpinning the growth and economic development of Victoria through supply of the construction materials.

In 2017/18, the sector supplied 58 million tonnes of construction materials to the market, at a value of approximately \$948 million. Small to medium quarries account for approximately half of this production.

Thank you for the opportunity to comment on the Draft Melbourne Industrial and Commercial Land Use Plan (Plan).

The CMPA supports the principle of responsible, balanced legislation that is in the best interests of the State of Victoria.

#### **Discussion**

The following statement in the Plan (p.34) is supported by CMPA:

*“The region also has large areas set aside with significant high-quality extractive resources for quarrying operations. A shortfall in extractive resources close to market means that the cost of construction will rise as these materials are sourced from further afield. These operations need to be protected both now and into the future to secure adequate long-term supply of quality and competitively priced extractive resources for growing Victoria’s population and economy, especially with demand for extractive resources expected to double between 2015 and 2050.”*

Actual figures submitted to Government demonstrate that for 2017/18 the tonnages of construction material being produced (<https://earthresources.vic.gov.au/legislation-and-regulations/regulator-performance-reporting/annual-statistical-reports>) are tracking higher than the highest point on the prediction curve in the Extractive Industry Supply and Demand Study 2016. Another important impact of locating quarries close to market is a reduced carbon footprint.

Below are extracts from Government documents published over the last 3 years related to extractive resources.

Extractive Industry Supply and Demand Study 2016

*“The extractive resources industry currently faces challenges in maintaining access to supplies of quality extractive resources. This is due to a combination of rising demand and encroachment of urban and regional development into existing resource areas.”*

Plan Melbourne 2017 Implementation

*“Action 18*

*Management of extractive industry*

*Protect the extractive industry and future extractive-resource assets from incompatible land uses by adopting planning options consistent with the findings of the Extractive Resources in Victoria, Demand and Supply Study, 2015–2050.”*

Joint Ministerial Statement Extractive Resources: Rock Solid Foundations for Victoria’s Growth 2018

*“APPLY THE ‘AGENT OF CHANGE’ PRINCIPLE TO QUARRIES: Greater scrutiny is needed to prevent the incursion of new development into quarry buffer zones, which result in pressure for premature closure of a quarry. The ‘agent of change’ principle will be applied to existing quarries. This principle puts the onus on the applicant proposing a new use or development that encroaches within buffers of an existing quarry to take measures to mitigate any impacts from those existing or planned activities. This includes an approved area where future quarrying activity may occur. The principle will protect the existing use rights, while also ensuring complementary land uses for adjacent sites. For greenfield quarries, particularly those in Strategic Extractive Resource Areas, we will better delineate areas of strategic importance and recognise these within the planning system. Ultimately, this will result in the codification of buffers that prioritise extraction and prevent encroachment on strategic resources.”*

## **Conclusion**

It is noted that the first two documents have been cited in the Plan but the intent of the Joint Ministerial Statement Extractive Resources also needs to be included. I have also attached a brochure recently released by CMPA on ‘Quarries Build Communities’.

I would be happy to discuss our submission further at your invitation.

Yours sincerely

A handwritten signature in black ink that reads "EM Gibson". The letters are cursive and somewhat stylized.

Dr Elizabeth Gibson

General Manager

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