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.

SEE ATTACHED SUBMISSION
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?
No

If no, please let us know why and how they could be improved.
SEE ATTACHED SUBMISSION

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 ATTACHED SUBMISSION

**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 ATTACHED SUBMISSION

*Would you like to comment on any other aspects of the plan?*
If you would like to upload a submission, please do so here.

I am making this submission:

on behalf of a land owner

Email address (Optional)

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

I agree to the privacy statement

yes

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


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.
20 December 2019

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

Dear Sir/Madam,

GLG Invest Submission to the Draft Melbourne Industrial and Commercial Land Use Plan
Re: 200 Officer South Road, Officer South

Ethos Urban acts on behalf of GLG Invest Pty Ltd on this matter and hereby make the following submission in relation to the Draft Melbourne Industrial and Commercial Land Use Plan. Our client, GLG Invest Pty Ltd, has interests in 200 Officer South Road, Officer South which is located within the Officer South Precinct Structure Plan (PSP) area. The subject land is designated as ‘business with residential’ in the South-East Growth Corridor Plan, which we submit should be retained and acknowledged in the Draft Melbourne Industrial and Commercial Land Use Plan.

The Victorian Government has prepared the Draft Melbourne Industrial and Commercial Land Use Plan (‘the strategy’), that consolidates Plan Melbourne’s policies, strategies and actions for future employment and industry needs to provide a planning framework to better inform future strategic directions for industrial and commercial land. It includes the establishment of a classification system to enable industrial land to be categorised as being either of local, regional or state significance, in part to assist in the identification of which land should be retained for industrial and commercial purposes, and conversely whether it can be considered for alternative uses, such as residential. For the implementation of this framework, the plan provides zoning recommendations for industrial land and follows the existing activity centre classification as a guide for commercial areas.

The subject land is located in the Officer South Precinct, for which a PSP is currently being prepared for by the Victorian Planning Authority (VPA). The PSP will provide a more detailed guide for land uses that must have regard to all relevant state significant planning documents, including the strategy. Within the strategy, we support the statement on page 93, that clearly identifies the relationship between the processes of precinct structure planning and the strategy. Moreover, the acknowledgement that “careful consideration will be required through the PSP processes to ensure adequate provision is made to accommodate medium and longer term industrial and commercial development.” We submit that the strategy needs to acknowledge the current ‘business with residential’ designation and adequately ensure that enough flexibility is allowed to enable satisfactory land use outcomes, to be determined in the preparation of the Officer South PSP.

The commencement of the Officer South PSP will also ensure that detailed planning occurs at a local level and that future land use responds to local planning outcomes. Both the VPA and Cardinia Shire Council have recognised the relationship between Officer South and the Cardinia Road Employment Precinct to its east, and the need to interrogate and reassess the land use outcomes of the broader area.

The South East Growth Corridor Plan designates ‘business with residential’ land located north of Lecky Road within the Officer South Precinct, however the strategy now designates this area as a ‘future growth area business precinct’ (see Figure 1). We note that a similar statement made on page 36 of the strategy provides incorrect information, “Growth area business precincts are identified in Growth Corridor Plans”. Whilst there are ‘business’ precincts identified in the Growth Corridor Plans, we reinforce that these areas are a separate classification and distinct from the designation of ‘business with residential’. We submit that the strategy does not appropriately acknowledge the different outcomes associated with these separate and distinct designations and by doing so undermines the intent and strategic basis of the Growth Corridor Plans.
The Strategy has identified ‘growth area business precincts’ as, “large flexible multiuse areas identified in Growth Corridor Plans. They are generally located adjacent to town centres or along Principal Public Transport Network routes. These precincts are expected to deliver more intensive forms of employment generating uses in comparison to industrial areas. They will accommodate a wide range of employment generating uses including service industry, office and commercial activity, and research and development and some bulky goods (restricted retail).”

In some sections of the strategy, there is mention of residential uses as being suitable for future business precincts in the municipalities of Cardinia and Casey. However, this is not consistently stated throughout the document. References throughout the strategy in respect of ‘future growth area business precincts’ have not highlighted this as a key issue for planning in those areas designated as ‘business with residential’. Meanwhile, the South East Growth Corridor Plan explicitly recognises the precinct’s residential use potential, with its recommendation for high-density residential uses in the Officer-Pakenham Industrial/Business Corridor. We believe that the subtle change in terminology between the two documents, and the exclusion of residential uses in the definition of ‘growth area business precincts’ in the strategy undermines the potential of ‘business with residential’ to accommodate future residential uses that may be required and that is clearly outlined by the Growth Corridor Plans.

In the strategy’s proposed planning framework, growth area business precincts are considered to be regionally-significant commercial areas, which are treated in the same manner as Major Activity Centres under the existing activity centre classification. We support the acknowledgment within the strategy for residential uses to form part of a broader mix of activities that will support the overall employment activities of precincts. This direction is consistent with Plan Melbourne’s policies to create 20 minute neighbourhoods, and to provide medium and higher-density housing in activity centres, where there is good access to jobs, services and public transport.

On pages 91 and 92 of the strategy, Tables 30 and 31 provide the supply of commercial land and commercial floorspace requirements for 2016 to 2031. These tables show a supply of 461 hectares of future commercial land and a demand for an additional 249,100 square metres of commercial floor space is required in the Shire of Cardinia. Using a conservative assumption for associated land requirements to be at three times the floorspace
area, the demand for commercial land required to accommodate the additional floorspace amounts to only 74 hectares. For this reason alone, we believe that the alternative uses as forecast within the ‘business with residential’ designation and anticipated in the Officer South PSP, can be accommodated without any detrimental or impact on the future commercial land supply in Cardinia.

Additionally, the future residential population that will be accommodated within the ‘business with residential’ areas will contribute to the necessary population required to ensure the viability of both the Officer Town Centre to its north, and the Kaduna Park Town Centre, a future neighbourhood activity centre to its east. The strategy designates the remainder of the Officer South Precinct as ‘Future State Significant Industrial Land’, that is unlikely to accommodate any future residential use. This reinforces the need for the residential uses forecast by the ‘business with residential’ to be explicitly acknowledged as part of the future ‘growth area business precinct’ located in the Officer South PSP.

In order to emphasise the potential for residential uses in Casey and Cardinia’s future ‘growth area business precincts’ that have been previously identified as ‘business with residential’ in the Growth Corridor Plans, we propose the following changes to be made to the strategy:

1. On page 36, when identifying ‘growth area business precincts” directly acknowledge the “business with residential” areas that are designated and the separate land use classification and capacity to provide for residential outcomes.
2. On page 93 under ‘Planning framework for industrial and commercial land across the (Southern) region’, include mention of the suitability of areas designated as “business with residential” in Cardinia and Casey to accommodate residential uses, as has been stated previously on page 91. This supports statements made elsewhere in the strategy which acknowledge the contribution of residential uses in supporting the overall employment activities of precincts.
3. On page 94, include a point stating the need for planning for future PSPs in the region and include directions for structure planning to give considerations for residential or mixed-use developments to support commercial and industrial land in these areas.
4. Amend the definition for ‘growth area business precincts’ in the Glossary to include direct acknowledgement of the ‘business with residential’ land use classification and the broader range of land uses that that will be accommodated in these locations and emphasise that this use is permitted and necessary, or alternatively have a separate and distinct definition for ‘business with residential’ land use classification.

As the preparation for the Officer South Employment PSP is currently ongoing, we recommend that the proposed changes to the draft strategy be made as early as possible as it will be critical for these to be considered in the initial stages of the precinct structure planning process.

Thank you for the opportunity to make this submission to the strategy. If you have any further queries in relation to this submission, please do not hesitate to contact me directly.

Yours sincerely,

[Signature]

Director - Planning