

## Planning Implementation (DELWP)

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**From:** contact@engage.vic.gov.au  
**Sent:** Friday, 20 December 2019 11:43 AM  
**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](mailto: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?**

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

## **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?**

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

## **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?**

**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?**

Please refer attached

**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?**

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

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

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





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

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20<sup>th</sup> December 2019

Planning Implementation Team  
Department of Environment, Land, Water and Planning

*By email: [planning.implementation@delwp.vic.gov.au](mailto:planning.implementation@delwp.vic.gov.au)*

RobertsDay  
*planning.design.place*

Dear Sir / Madam

**RE: PLANNING FOR MELBOURNE'S INDUSTRIAL AND COMMERCIAL LAND (ICLUP)  
ROBERTS DAY SUBMISSION**

Roberts Day act on behalf of a number of landowners and developers of former industrial land within several of Melbourne's inner and middle ring municipalities. We commend the Department on the preparation of the ICLUP document, and welcome the opportunity to provide this submission.

This submission is focused primarily on the mapping and commentary in respect to local industrial land and/or precincts, with reference to some specific examples. However, we make this submission in the context of a broader observation that the role of appropriately located brownfield land, be that former industrial, commercial or other employment generating uses that can be proven not to have a useful future in their former single use character, in helping address Victoria's significant population challenge, should not be lost.

We acknowledge the increasing demand on health, community and waste management services created by the state's growing population, and the criticality of improving economic performance and productivity in order to contribute to improved living standards for all Victorians. However, the ICLUP should take a more balanced view on the role of vacant, under-performing and poorly-located industrial land (for ongoing single-use industrial or employment purposes) for residential and/or mixed use development. This land is often located where it can optimise existing infrastructure already embedded in the urban fabric. There is also a clear trend globally away from single use industrial precincts and business parks in favour of a more fine grained mixed use assembly of connected employment, residential, community and other uses as the most dense generators of new employment.

Further, the traditional reliance on existing single use zoning, such as the Industrial 1 Zone in locations where government is trying to increase employment density must be revisited, because this

roberts day  
abn 53 667 373 703  
level five  
411 collins street  
melbourne  
vic australia 3000  
t+61 3 9620 5421  
[robertsday.com.au](http://robertsday.com.au)

approach has been proven not to be able to deliver the levels of amenity that new, contemporary business generation is seeking.

The mapping of locally significant industrial land within the ICLUP does not appear to take into account strategic guidance or the applicable planning policy and controls framework applying established through the work of local authorities.

We note the following strategy identified under Principle 3 for guiding the planning of industrial and commercial land:

*Land identified as being of local significance for industrial purposes should only be considered for mixed-use or residential purposes where strategic analysis can clearly demonstrate that the land is no longer required for industry, business or employment purposes.*

We also note the following statement under the Local Industrial Precincts commentary on P33:

*Councils are best placed to determine how these industrial areas are to be planned for. This could include identifying when industrial land should be retained, when it could transition to other employment generating uses, or if it is no longer required, when it could transition to other mixed-use development.*

*Councils should undertake an industrial land use strategy to support their planning policies for industrial land. Proposed guidance for developing an industrial land use strategy is provided at Appendix 2.*

However, in identifying various land parcels in the ICLUP as locally significant industrial land, a presumption is created that even sites for which there is a clear strategic basis for mixed use outcomes within the local planning/ policy context, they will be required to satisfy a further hurdle created by this ICLUP principle/ strategy and commentary.

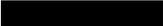
Two specific examples that can be referred to, both located within the City of Maribyrnong, are:

- 142 Ashley Street, Maidstone: This land parcel, located on the corner of Ashley Street and Ballarat Road, benefits from a recent Planning Scheme Amendment (Amendment C124) which designated the site as Mixed Use Zone and established a Design and Development Overlay setting a clear framework for medium to higher density residential outcome on the land. Yet it is identified on Map 6 Western Regional Future Direction Map – Industrial Land as Local Industrial Land. This designation is therefore erroneous.
- 35-77 Emu Road, Maidstone: At Clause 21.11-8 (Maidstone Hampstead Road East Precinct) of the Maribyrnong Planning Scheme, the Council articulates a clear vision for this local industrial precinct. A plan forms part of the policy guidance to highlight the Council's preferred land use activities throughout the precinct, noting the site is identified for future mixed use (employment use and higher density residential), ranging in height from 2 – 5 storeys and accommodating a large open space. In this regard, DELWP's classification of 35-77 Emu Road as industrial does not align with Council's policy aspirations, which clearly sees the land as no longer performing an industrial role.

An example of where the Industrial 1 zoning of land has stalled efforts to transition land into a more productive employment future is with respect to the Brooklyn Business Park. The VPA have been working in partnership with Hobsons Bay Council, Maribyrnong City Council and local and state agencies to prepare a Comprehensive Development Plan for Brooklyn Business Park. This site has been identified as a key strategic site for renewal, and planning will focus primarily on creating new employment opportunities for the West. In light of its proximity to the Westgate tunnel project, this precinct has been seen as a good candidate for an embellished future employment role. However, at this point in time the VPA are unable to

secure the support of all government agencies to commence on structure planning. The Industrial 1 zone has not facilitated the delivery of an integrated street network supported by the necessary amenity and services required to stimulate contemporary employment growth. We support the commentary in the ICLUP that alternate zones such as Commercial 2 and 3 Zone should be employed in instances such as this, in order to provide for a broader and more finer grained land use pattern that is more likely to spark connections, idea creation and employment energy and density. Commercial 1 Zone, the Activity Centre Zone and Mixed Use Zone should also be considered in appropriate settings.

We trust our submission is clear. We would welcome the opportunity to contribute further to this important work.

Should you have any queries or require any additional information regarding this submission, please do not hesitate to contact the undersigned 

Yours sincerely,  
ROBERTS DAY PTY LTD



Principal