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?

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?

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.

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

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1 Introduction

ALDI welcomes the opportunity to comment on the draft Melbourne Industrial and Commercial land use plan (‘draft plan’). We are supportive of the plan as we consider that strategic guidance to ensure the supply of industrial and commercial land is vital for Melbourne’s future economic development.

Melbourne’s population continues to grow and it is important to ensure that land is available to provide employment opportunities for this growth. Residential development encroaching on employment land threatens to push employment land further out towards Melbourne’s fringes away from many residents.

The changing face of the Victorian employment market means that traditional employment generators, such as manufacturing and warehousing, are becoming less commonplace. This employment generation is more frequently provided via land uses such as offices and retailing.

ALDI represents a major stakeholder in the future planning for industrial and commercial land across Melbourne and Victoria. ALDI has 156 stores across Victoria and employs approximately 3,500 people across the Victorian regions.

A significant proportion of these stores are located within commercially zoned land, including the Commercial 1 and 2 and Industrial 3 zones. We therefore have a strong interest in long-term planning processes that seek to ensure the future supply of land that is appropriate for supermarkets.

2 Recommendations

ALDI principally supports the idea for a consolidated plan to provide strategic direction for the future of Melbourne’s employment land. We believe it is important to understand current supply of industrial and commercial land and to plan appropriately to protect existing land and ensure new land in appropriate areas.

Whilst we support the general direction of the draft plan, we consider that the base data and assumptions risk providing an incorrect understanding and guidance for policymakers.

The base data is drawn from the UDP and the draft plan appears to nominate all Commercial 2 Zoned Land as 'industrial land' and not 'commercial land'. This is not reflective of the substantive use of this land.

We acknowledge that the Commercial 2 Zone includes Industry uses as as-of-right uses (subject to conditions), however, a principle use of this zone is for offices and retailing, including supermarkets.

We fear that the lack of distinction of Commercial 2 zoned land from other land that allows industry risks an underappreciation of the value of this land and therefore a future shortfall of Commercial 2 zoned land supply.

We therefore make the following recommendations and comments;

- We support the proposed application of Industrial 3-zoned land in the state, regional and local levels of the industrial planning framework.

- We recommend that the inclusion of Commercial 2 Zoned land within the calculation of Industrial land needs to be reconsidered to ensure that commercial and retail uses are not unduly impacted.

- We consider that the commercial and retail application of Commercial 2 Zone is a critical component, and becoming more so, in providing commercial land within the developed and developing metropolitan
areas. We stress that the policy translation of the Plan into implementation must not prejudice the application of Commercial 2 Zone land to existing and planned activity centres.

— We support the Plan’s principles that will seek to protect existing and identified future supply of industrial and commercial land from rezoning or encroachment by incompatible land uses.

— Notwithstanding the above, we note that the fourth strategy of principle 2 (page 32) states ‘Avoid the approval of non-industrial land uses that will prejudice the availability of land in identified industrial areas for future industrial uses.’ This strategy should be reconsidered as the translation of this strategy to Planning Scheme policies at Regional, State or Local (including Industrial Land Use Policies) level could have the effect of limiting big box retailing, supermarkets and offices within Commercial 2 Zoned and Industrial 3 Zoned land.

— The Plan identifies the need to develop a system for monitoring take-up and availability of commercial land. We support this initiative as it will provide a better base of information to inform strategic policy. We recommend that the methodology and reporting format needs to be developed with input from industry stakeholders and experts to ensure it provides data that properly reflects the on-ground activity.

— Pages 33-35 of the draft plan proposes a classification framework to assist the planning of industrial precincts based on the significance of the precinct. The Commercial 2 Zone is included as an appropriate zone for all of levels of significance, particularly for Regionally-Significant and Local industrial precincts. We believe this classification does not accurately reflect the other primary purposes of Commercial 2 Zone land which is to encourage ‘commercial areas for offices, appropriate manufacturing and industries, bulky goods, retailing, other retail uses, and associated business and commercial services.’ (emphasis added).

— Further to the above, page 36 of the Plan deals with ‘Commercial areas’ and provides a more broad-brush approach when discussing the classification of the role and purpose of commercial land. We note that the use of Commercial land for offices and bulky goods retailing is discussed as necessary for growth area commercial precincts, but existing precincts appear to primarily refer to retail operations. We do not believe that this distinction is justified.

— The Plan identifies a need to review the Commercial Zone’s with regards to as-of-right dwellings within Commercial 1 Zones and the operation of the Commercial 2 Zone in industrial areas. We support this review and suggest that a review of the Commercial 1 Zone should consider the impacts of residential encroachment into Commercial land, particularly in regard to increased cost of land due to supply being taken up by residential land uses and introduced amenity considerations due to residential sensitivity.

— We further recommend that any review of the Commercial Zone’s should include broad engagement with stakeholders through a separate process.

— Part 2 of the plan, in which the individual regions are reviewed, appears to include big box retailing and offices type uses within the discussion of Commercial Land and limit the discussion of land uses within industrial areas to traditional manufacturing and warehousing land uses. Whilst we consider this is a correct classification of these land uses, it is inconsistent with rest of the plan as described above. Given the plan itself includes this inconsistency, we would suggest that the value of Commercial 2 and Industrial 3 Zoned land could be misunderstood if the above items are not rectified.

3 Summary

We consider that greater guidance for the protection and growth of appropriate commercial and industrial land supply is vital for the future development of economic viability of Melbourne and we, therefore, support the development of the Melbourne industrial and commercial land use plan.

We appreciate that the draft plan acknowledges that there are weaknesses in the current measuring tools for Commercial Land supply, however we consider that the wholesale inclusion of land for big box retailing, supermarkets and offices being measured as ‘industrial land’ is incorrect and should be reconsidered.
Overall, we support the principles and strategies contained within the Draft Melbourne Industrial and Commercial Land Use Plan, subject to the recommendations identified above.

We would appreciate remaining part of the draft plan review. Please ensure we are informed as the process moves forward.

Kind Regards,

ALDI Stores

Property Director