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.
Please refer to 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.
Please refer to 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?
No
If no, please let us know why and how they could be improved.

Please refer to attached submission.

**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?

N/A

**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.

Please refer to attached submission.
Would you like to comment on any other aspects of the plan?
Please refer to attached submission.

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
Dear Sir/Madam,

Oreana Property Group Submission to the Draft Melbourne Industrial and Commercial Land Use Plan – Officer South

Ethos Urban acts on behalf of Oreana Property Group on this matter and hereby make the following submission in relation to the *Draft Melbourne Industrial and Commercial Land Use Plan* (‘the Strategy’ or ‘MICLUP’). Our client, Oreana Property Group, has interests in land within the Officer South Precinct Structure Plan (PSP) area. Their land holdings include:

- Lecky Road, Officer South
- Officer South Road, Officer South
- Stephens Road, Officer

The land holdings are 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*.

![Figure 1. Aerial photo showing Oreana land holdings in Officer South](image)

The Victorian Government has prepared the *Draft Melbourne Industrial and Commercial Land Use Plan* (‘the strategy’), consolidating 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 Precinct Structure Plan (PSP) is currently being prepared for by the Victorian Planning Authority (VPA). The PSP provides a more detailed guide for land uses that will need to consider and have regard to all relevant state significant planning documents, this includes the *Draft Melbourne Industrial and Commercial Land Use Plan*. Within the document, we support the statement on page 93, that clearly provides the relationship between the processes of precinct structure planning and this strategy. And 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 enable satisfactory land use outcomes through 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 conditions. 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 this 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 designations and by doing so undermines the intent and strategic basis of the Growth Corridor Plans.

The South East Growth Corridor Plan does not provide a definition for ‘business with residential’, however mentions the potential for the area to accommodate high density residential uses in support of the Officer-Pakenham Industrial/Business Corridor.
The Draft Melbourne Industrial and Commercial Land Use Plan defines ‘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).”

Figure 2. Subject land as part of the South East Growth Corridor Plan

In some sections of the document, 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 and in references made for future growth area business precincts in those areas and is not highlighted as a key issue for planning in the Southern Region where this is a unique provision. 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 any future residential uses that may be required as had been clearly outlines 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 that 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 Cardinia. Using a conservative assumption for land requirements to be at three times the floorspace area, the demand for commercial land to accommodate the additional floorspace required amounts to only 74 hectares. For this reason,
we believe that alternative uses as forecast with the ‘business with residential’ designation and anticipated in Officer South, can be accommodated with no detrimental impact on future commercial land supply in Cardinia.

Additionally, the future residential population that the site is likely to provide will contribute to the population required to ensure the viability of the Officer Town Centre to its north, and for the Kaduna Park Town Centre, a future neighbourhood activity centre to its east. The strategy designates the remainder of the Officer South Employment precinct as Future State Significant Industrial Land, which is unlikely to be able to accommodate any residential use. This reinforces the need for residential uses to be highlighted as an alternative use for the future growth area business precinct in Officer South.

In order to emphasise the potential for residential uses in Casey and Cardinia’s future growth area business precincts, we propose the following changes to be made to the draft 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 the mention of the ‘business with residential’ land use classification and the broader range of land uses that will be accommodated in these locations and to emphasise that this use is permitted and necessary, or have a separate definition for ‘business with residential’.

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 Draft MICLUP. If you have any further queries in relation to this submission, please contact the undersigned.

Yours sincerely,

Director - Planning