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
To the Planning Department

RE: SUBMISSION TO THE DRAFT MELBOURNE INDUSTRIAL AND COMMERCIAL LAND USE PLAN
   BROWNS ROAD, WERRIBEE

Beveridge Williams acts on behalf of ZL International Investment Pty Ltd, who has an interest in the subject site at Browns Road in Werribee. On behalf of our client, we have reviewed the draft Melbourne Industrial and Commercial Land Use Plan as it affects our client’s property and we make the following submission. We request reconsideration of the boundary of Future Regionally Significant Industrial Land to exclude the land to the east of Lollypop Creek within the Werribee Junction FSP, and specifically Browns Road, Werribee.

Site Context

The subject site is located within Wyndham City Council and is approximately 3.7km south-west of the Werribee Town Centre. The subject site is located to the east side of Browns Road and west of the Princess Freeway, as identified in Figure 1 below.

![Figure 1: Browns Road, Werribee - Site Context (Source: VicPlan)](image)
The subject site is formally known as Lot 1 on Title Plan [redacted]. The site is approximately 54 hectares in area and is relatively flat. There is minimal vegetation on the site except for that associated with Lollypop Creek that enters and exits the south western corner of the site.

Our client has requested that we assess the site for its residential potential being located within the proposed Werribee Junction Precinct Structure Plan (PSP). The PSP preparation is currently at a preliminary stage with formal background reports still being prepared.

Approximately 1.6 kilometres to the west of the subject site is the Werribee Landfill and Holcim Australia Werribee Quarry, and approximately 270 metres to the north, land being developed for residential use within the approved Alfred Road PSP, as evident in Figure 2 below.

![Figure 2: Browns Road Context (Source: Nearmap 1 October 2019)](image)

The recently published draft Melbourne Industrial and Commercial Land Use Plan nominates the subject land as being within the eastern fringe of an area identified for Regionally Significant Industrial Land – Future (Figure 3).

![Figure 3: Future Regionally Significant Industrial Land (Source: Draft Melbourne Industrial and Commercial Land Use Plan)](image)

For the reasons outlined below, we submit that site should be excluded from the future regionally significant industrial land.
Lollypop Creek as a Natural Boundary

The regionally significant industrial land is currently proposed to extend almost to the eastern boundary of the Werribee Junction PSP. We submit that a more appropriate boundary for the industrial land is Lollypop Creek.

Lollypop Creek is an integral asset to Werribee and surrounding catchments, as it provides essential drainage and aesthetic significance to the area. We contend that the there is an opportunity for the Creek to provide an appropriate natural boundary between residential and industrial land, as it will enable well-designed interfaces for residential land and allow for greater interaction between residents and the Creek.

We contend that the utilisation of the existing creek as a natural boundary is a better urban design outcome which will in turn result in the encouragement of greater utilisation and surveillance of the area. In providing the Creek as an interface for future residential land, a healthier and more active lifestyle would be encouraged for residents. It will also provide a natural buffer between residential and industrial land, which can be further expanded by incorporating walking trails and the like to encourage greater interaction with the area’s natural features.

As such, we propose the most practical solution is to reserve land to the east of Lollypop Creek for future residential uses, and land to the west for future industrial uses, as depicted in Figure 4.
Based on Best Practice Environmental Management (BPEM), the quarry requires a minimum 500 metre buffer distance. The site at Browns Road is setback from the extractive industry and landfill site by approximately 1.6 kilometres (Figure 2), which is significantly greater than EPA’s required buffer distance.

While the EPA has set a default buffer distance from an extractive quarry industry of 500 metres, it is important to consider a site-specific Environmental Risk Assessment to better define the requirements for avoiding an unacceptable risk odour.

In 2015, GHD were commissioned by Wyndham City Council to undertake an environmental audit in order to determine the appropriate buffer distances from the existing and surrounding quarry, landfill and organic waste treatment sites in the area. This audit is used to help inform the Precinct Structure Plans (PSPs) in the area including the Werribee Junction PSP. The Wyndham Vale Buffer Study presents and evaluates potential amenity impacts associated with the future expanded use of extractive industry and the landfill site.

Dispersion modelling has been conducted to predict the maximum off-site ground level odour concentrations resulting from odour emissions for various current and future scenarios. Based on the State Environment Protection Policy (Air Quality Management) a ‘general odour’ is set to 1 odour unit (OU).

The study provides contours of various OU levels surrounding the tipping face, indicating the extent of impact to the air quality of surrounding areas. It provides that an OU level of 5 is the level at which odour can be clearly distinguished under a large tipping face, and which may lead to nuisance and resultant complaint. The study suggests that an OU level of below 5 may not be sufficient to lodge a complaint even with a worst-case scenario. The study also suggests that areas with an OU level of less than 5 is appropriate for development of sensitive land uses (such as residential).

The Wyndham Vale Buffer Study explores four future scenarios of operation for the Werribee Landfill and Quarry Site (identified as Site A in the Wyndham Vale Buffer Study). Future Scenario 4, which is based on the worst-case scenario, considers a future landfill operation (with a throughput of 1,000,000 tonnes per annum (tpa)) plus a proposed in-vessel organic treatment facility (at maximum throughput of 35,000 tpa). Based on this scenario, the land to the east of Lollypop Creek and in particular the land at Browns Road, only partially encroaches into the buffer contour of 1 OU. There are no encroachments into any portion of the 2 OU level buffer contour, as shown in Figure 5 below. Lollypop Creek and Browns Road are setback from the 5 OU level buffer contour by a minimum of approximately 540 metres and 850 metres respectively.

It is worth noting that the report acknowledged that Scenario 4 is potentially over conservative, and the future operation impacts of the landfill site will likely be notably less.
Figure 5: Predicted Odour Impact – Future Scenario 4 (Source: Wyndham Vale Buffer Study)

Based on the findings of the study it is therefore considered that the land to the east of Lollypop Creek, and specifically the land at Browns Road, is appropriate for the development of sensitive land uses (such as residential).

Further, the Black Forest Road South PSP was approved by the Minister for Planning in August 2013. This PSP is predominately reserved for residential land, which is currently being developed. At its closest point, the Black Forest Road South PSP is approximately 750m north from the Wyndham Refuse Disposal Facility boundary. When applying the findings of the Wyndham Vale Study Buffer, the Black Forest Road South PSP partially encroaches into the 1OU level buffer contour of the Future Scenario 4 resulting in potential odour impact intersecting with approved residential land (refer to Figure 6).

Figure 6: Predicted Odour Impact in relation to Black Forest Road South PSP (Source: Wyndham Vale Buffer Study)
Melbourne Water Development Services Scheme Investigation

A letter from Melbourne Water dated 6 December 2019 notifies the landowner that Melbourne Water has commenced the investigation of the Lollypop Creek Lower Development Services Scheme (DDS). The reason for the DDS investigation is to support the rezoning of the area for urban development and to support the Werribee Junction Precinct Structure Plan. While the investigation may take 1 – 2 years, it will likely highlight the importance of Lollypop Creek and reinforce its role as a significant waterway for the area and thus may provide support for residential development on the site.

Summary

We submit that the land to the east of Lollypop Creek within the Werribee Junction PSP, and specifically Browns Road, should be excluded from being within the Future Regionally Significant Industrial Land as identified in the draft Melbourne Industrial and Commercial Land Use Plan. We propose that DELWP reconsider the extent of future industrial land within the proposed Werribee Junction PSP for the following reasons:

- The land will not be unreasonably impacted by odour impacts of the landfill site as demonstrated by the existing odour impact studies.
- The Black Forest Road South PSP, which is located approximately 750m north from the quarry and landfill site and partially encroaches into the 1 OU level buffer contour, is deemed to have exposure to an acceptable odour level for residential development.
- Lollypop Creek provides for a more natural and distinct boundary to the future industrial area and will form a natural boundary to the industrial area.
- The land to the east of Lollypop Creek is well suited to being developed with residential and more sensitive land uses who will be able to utilise recreational activities along the creek to provide activity and passive surveillance along the creek interface.
- Melbourne Water is preparing a Development Service Scheme Investigation specifically for the Lollypop Creek area, which is likely to highlight the importance of Lollypop Creek and reinforce its role as a significant waterway for the area.

We look forward to further discussion on these matters.

Should you require any further information, please contact the undersigned on

Yours sincerely,

Town Planner
BEVERIDGE WILLIAMS

cc: DELWP, Client