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?

Please refer to 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.

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
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.

Privacy Policy Log In to Site

Produced by The State Government of Victoria. All rights reserved.
31 December 2019

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

Dear Sir/Madam,

**Parklea Developments Submission to the Draft Melbourne Industrial and Commercial Land Use Plan (DRAFT)**

Ethos Urban acts on behalf of Parklea Developments on this matter and hereby make the following submission in relation to the *Draft Melbourne Industrial and Commercial Land Use Plan* (the MICLUP).

Parklea control extensive landholdings throughout Melbourne’s Southern Region, which comprise a range of future urban land parcels that are vacant or are currently undergoing development. This submission details the key considerations which should be addressed through planning for Melbourne’s future urban areas, and relate to the following key issues:

- Achieving the appropriate land use mix in new growth areas, to ensure the viability of the planned activity centre network,
- Coordinating infrastructure delivery to ensure the competitiveness of future employment land, and
- Ensuring the appropriate future supply of industrial land in the Southern SSIP.

It is submitted that inflexible State Planning Policy should not adversely impact local planning outcomes, by compromising the flexibility that is required through the preparation of a local structure plan, or Precinct Structure Plan (PSP). For Melbourne’s urban growth areas, the Growth Corridor Plans have successfully guided the preparation of PSPs through not reserving, or sterilising land from timely development, but by providing a sound, high level strategic basis under which PSPs can be prepared.

The Victorian Government has prepared the MICLUP, which consolidates Plan Melbourne’s policies, strategies and actions for future employment and industry needs to provide a planning framework, with the objective of better informing future strategic directions for industrial and commercial land. It includes the establishment of a classification system to enable land to be categorised as being either of local, regional or state significance to assist in the identification of when land should be retained for industrial and commercial purposes, and if this can be considered for alternative uses such as residential uses.

**Sites and Strategic Planning Context**

Parklea has significant, strategic land holdings in two key locations in the southern region of metropolitan Melbourne. These are summarised below.

**Cardinia Urban Growth Corridor**

Planning for the Cardinia Urban Growth Corridor in Melbourne’s South East Growth Corridor is nearing completion. Parklea holdings in this area are within the Cardinia Road Employment Precinct (CREP) and the Officer South Precinct. Development in the CREP has already commenced, guided by the Cardinia Road Employment Precinct Structure Plan (PSP), endorsed 2010. The CREP predominately comprises industrial land, supported by a Neighbourhood Activity Centre (NAC) at Kaduna Park and some residential development (which is currently being delivered).

The preparation of the Officer South Precinct Structure Plan (PSP) has recently commenced and is led by the Victorian Planning Authority (VPA). Parklea has significant landholdings in the precinct, all located south of Lecky.
Road. It is anticipated that the Precinct will largely comprise industrial land uses, with some residential development generally in the northern area of the precinct. Much of the industrial land in this precinct interfaces with the environmentally sensitive Cardinia Creek Corridor, which forms the precinct’s western boundary.

The future residential population to be accommodated within the Officer South PSP is required to support the viability of Kaduna Park Town Centre (located within CREP) at a local level, and Officer Town Centre (located within the Officer PSP to the north) at a regional level. Both centres are critical components of the Cardinia Shire activity centre network, and many aspects of the future urban structure of the Cardinia growth corridor have been delivered with these two future centres in mind.

![Map of Cardinia Urban Growth Corridor](image)

**Figure 1. Parklea’s landholdings in the Cardinia Urban Growth Corridor**

Parklea controls the delivery of approximately two-thirds of the residential dwellings in the identified catchment for the Kaduna Park NAC, which requires a minimum of 9,500 people (or approx. 3,400 dwellings) to be viable. Based on the density of residential development currently being delivered in the CREP, it is likely that only 1,800 dwellings will ultimately be delivered in this Precinct. The balance of the potential catchment to support this centre can only be located within the eastern area of the Officer South PSP area. Whilst the extent of residential land to be provided within the Officer South PSP is to be determined, to ensure viability of the Kaduna Park NAC, a minimum of 1,800 dwellings is required in Officer South, in addition to the 1,800 to be provided within CREP.

Although the MICLUP is concerned primarily with commercial and industrial land, it affects what land can be designated for residential and other alternative uses. Achieving the appropriate mix of residential, industrial, commercial/retail, and community facilities in the Officer South Precinct is critical to ensuring the optimal local planning outcome is achieved, including the timely delivery of Thompsons Road through the Cardinia corridor.
In the MICLUP, there are areas identified in Officer South to be ‘growth area business precincts’ which are designated ‘business with residential’ in growth corridor plans. 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 may undermine the potential of ‘business with residential’ land to accommodate future residential development that may be required, as had been clearly outlines by the Growth Corridor Plans.

On page 31 of the document, it is stated that the following issues and matters will require consideration:

“The business needs of developers, land owners and end users and their operating environment need to be better understood to inform policy development”, and “Planning frameworks need to enable new business models to be accommodated and employment areas to evolve over time.”

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.”

The MICLUP should provide guidance for PSPs to enable outcomes that are flexible and do not constrain areas in isolation. The relationship between PSPs must also be considered. We submit that the South East Growth Corridor Plan provides an appropriate level of guidance in this regard, and introducing inflexible state planning policy as set out in the Draft MICLUP is unnecessary, and will potentially compromise both the sequencing of development and infrastructure delivery in the corridor, as well as the ultimate planning outcome. It may also add unnecessary delays to the structure planning process for the Officer South Precinct.

In addition, the sequencing of development within the Officer South Precinct will influence timing of delivery of critical infrastructure in the South East Growth Corridor, including the Thompsons Road extension and crossing of Cardinia Creek. The Thompsons Road arterial is required to link the large residential population of the City of Casey with the Cardinia employment corridor, and to provide an alternative to the Princes Highway and Princes Freeway, which are at capacity in peak periods.

A preferred alignment for Thompsons Road has been designed by TTM Traffic Engineers that:

- Locates the future Thompsons Road reserve on Parklea-owned or controlled land;
- Aligns the road with the electricity transmission line easement that runs through the corridor, reducing risk of inefficient subdivision patterns; and
- Ensures that the road is capable of being delivered as one project.

The proposed alignment for this section of Thompsons Road is provided in Figure 2.

It is submitted that the delivery of Thompsons Road through the Cardinia urban growth corridor should be identified in the MICLUP as a priority infrastructure project for the Southern Region.
Figure 2. Proposed alignment of Thompsons Road in the Beaconsfield – Pakenham Corridor

It has for a long time been anticipated through State Policy that once land supply within the Dandenong South Industrial Precinct is exhausted, the high level of demand that this precinct has historically experienced will transfer to the Cardinia corridor. Currently, approximately 10 years of land supply remains at Dandenong South. Should this occur, it further highlights the need for the Thompsons Road delivery to be prioritised through State planning policy. Without this, the development potential of the Cardinia corridor could be significantly compromised.
Frankston City

Parklea has an interest in 87 hectares of land at Frankston-Dandenong Road, Carrum Downs (shown in Figure 3). The land is located in the Green Wedge Zone outside the Urban Growth Boundary (UGB), currently used as rural/agricultural land. Similar to the other sites discussed in this submission, it is located within the Southern Region.

The land has frontage to Frankston-Dandenong Road, Thompsons Road, and the Eastlink (M3), and is located adjacent to the major interchange of Eastlink and Thompsons Road. Moreover, the land is proximate to key economic development areas for the South East Metropolitan Region, in particular the Carrum Downs and Dandenong Industrial Precincts. The site is also proximate to Melbourne Water’s Eastern Treatment Plant.

Figure 3. Carrum Downs Industrial Expansion Area

According to the Urban Development Program, there are approximately 10 years of supply remaining in the South State Significant Industrial Precinct (SSIP), depicted in Figure 4. No significant supply remains in Frankston, where the land is heavily constrained by the UGB. Current policy is that the Officer/Pakenham corridor will accommodate future demand for industrial land. There is potential for 130 hectares of industrial land in nearby Cranbourne West to
be rezoned for residential use under the proposed Amendment C219 to the Casey Planning Scheme, which would further constrain industrial land supply in Melbourne’s southeast.

Plan Melbourne 2017-2050 states the need to increase the number and diversity of jobs closer to where people live, including the promotion of suburban employment clusters for which Dandenong, immediately to the north of Carrum Downs, is identified as a National Employment and Innovation Cluster (NEIC). The plan mentions the Dandenong NEIC as one of the most significant and productive manufacturing areas with the strong links of Carrum Downs employment area which contributes to the wider industrial network.

![Map of South Region Metropolitan Region & Dandenong South Industrial Precinct (circled)](image)

**Figure 4. South Region Metropolitan Region & Dandenong South Industrial Precinct (circled)**

The MCLUP identifies the existing Carrum Down Industrial Precinct as regionally significant and acknowledges that its expansion is constrained by the Urban Growth Boundary. As the subject site is located outside the Urban Growth Boundary, it is not recognised by the MCLUP as future industrial land. Situated at the Thompsons Road Eastlink interchange, the Carrum Downs site is well-serviced by existing transport infrastructure, including freight routes, and would not require further investment in the arterial road network for activation. The land is located in close proximity to major economic development attractors at the Carrum Downs industrial area in the Southern Region, and the Eastern Treatment Plant. The state-significant Dandenong South Industrial Precinct in the Dandenong NEIC is also within proximity and is connected to the subject site via Frankston-Dandenong Road.

We believe that an inclusion of the subject land as potential industrial land recognised by the MCLUP would contribute positively to the limited industrial land supply in Frankston, and the Dandenong South industrial area. We submit that the site presents a unique opportunity for a land which would make a ‘logical inclusion’ to the Carrum Downs Industrial Precinct, without setting precedent to encourage further sprawl.
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,

[Signature]

Director - Planning