

## Planning Implementation (DELWP)

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**From:** contact@engage.vic.gov.au  
**Sent:** Monday, 30 December 2019 9:23 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

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.



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](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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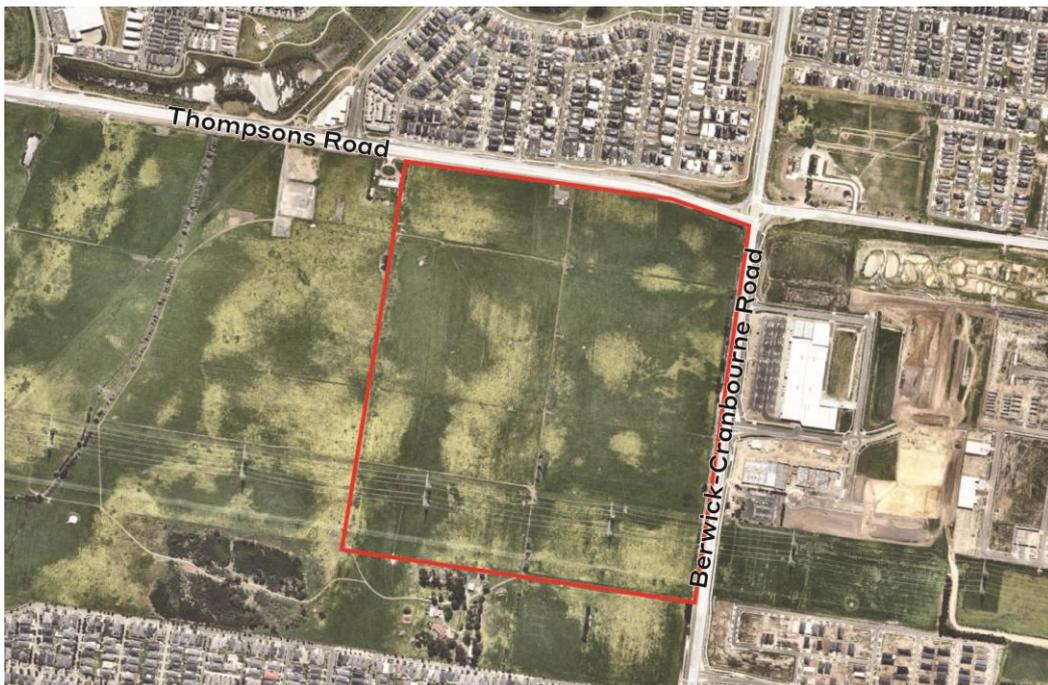
30 December 2019

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

Dear Sir/Madam,

## Oreana Property Group Submission to the Draft Melbourne Industrial and Commercial Land Use Plan – Clyde North

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 [REDACTED] Berwick-Cranbourne Road, Clyde North in the Croskell Precinct Structure Plan (PSP) area. The subject land is 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 of the subject land**

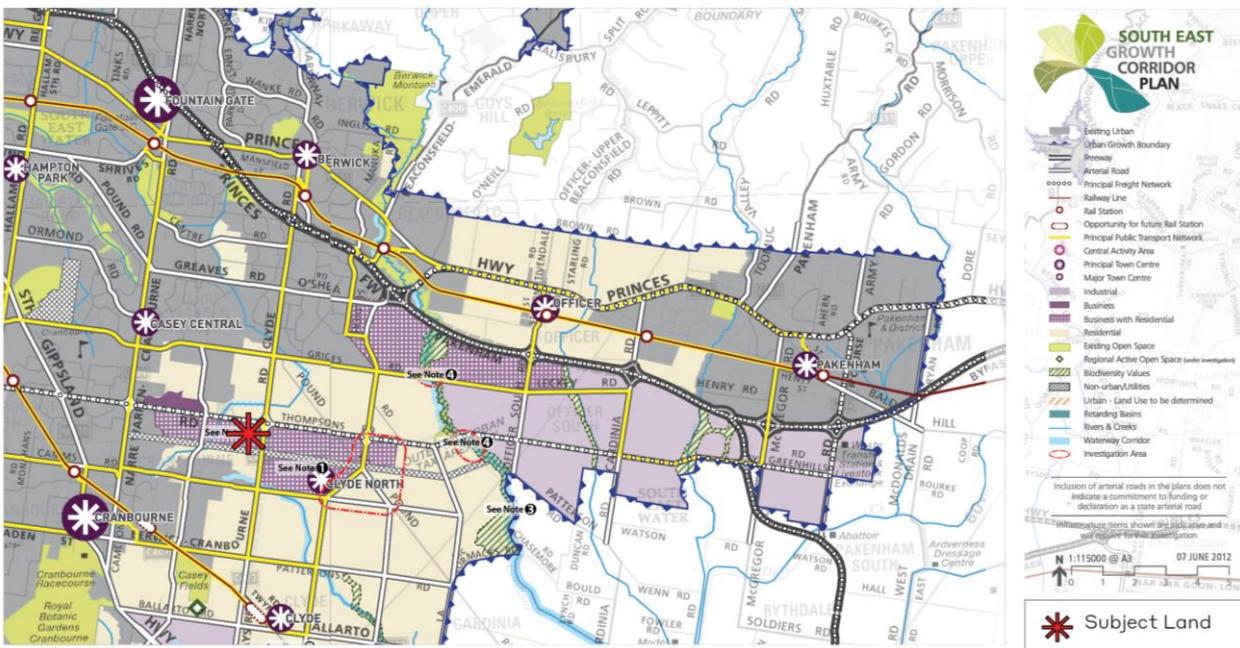
The Victorian Government has prepared the *Draft Melbourne Industrial and Commercial Land Use Plan* ('the strategy'), consolidating Plan Melbourne's policies, strategies and actions for future employment and industry needs to provide a planning framework to better inform future strategic directions for 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 Croskell Precinct, for which a PSP is currently being prepared by the Victorian Planning Authority (VPA). The PSP will provide a more detailed guide for land uses, and will need to consider and

have regard to all relevant state significant planning documents, including 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 should acknowledge the current ‘business with residential’ designation and ensure that sufficient flexibility is maintained to enable appropriate land use outcomes through the preparation of the Croskell PSP.

The commencement of the Croskell PSP will also ensure that detailed planning occurs at a local level and that future land use responds to local planning outcomes. There has been significant growth in the Casey and Cardinia in recent years, with future population expected to be at 644,700 people by 2031. There is a need for planning to ensure that it can support the forecast population growth in the region.

The South East Growth Corridor Plan designates ‘business with residential’ land located south of Thompsons Road within the Croskell 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.



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

The South East Growth Corridor Plan does not provide a definition for ‘business with residential’, however mentions the potential for the Thompsons Road Business Corridor to allow for some residential development along with employment uses. Along the Thompsons Road corridor, other recently completed developments within the same ‘business with residential’ designation comprise a mix of employment uses, conventional residential development and modern, mixed use precinct. These precincts provide good examples of genuine mixed use developments that include a residential component, demonstrating that mixed-use employment outcomes can be achieved through innovative design. Permitting mixed-use developments with residential components will provide the flexibility required for planning and will support the following statement made in the Draft MICLUP on page 31, “*Planning frameworks need to enable new business models to be accommodated and employment areas to evolve over time*”.

*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)."*

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 outlined 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 339 hectares of future commercial land and a demand for an additional 546,300 square metres of commercial floor space is required in Casey. 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 164 hectares; this amount is less than 50% of the commercial land identified for the City of Casey in Table 30. For this reason, we believe that alternative uses as forecast with the 'business with residential' designation and anticipated in the Croskell PSP, can be accommodated with no detrimental impact on future commercial land supply in Cardinia.

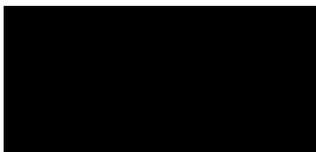
In order to emphasise the potential for residential uses in Casey and Cardinia's future growth area business precincts, we propose the following changes to be made to the draft strategy:

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 or mixed-uses in supporting the overall employment activities of precincts.
3. On page 94, include reference to 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 employment outcomes 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 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 Croskell PSP is currently underway, 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

