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?
Yes

If no, please let us know why and how they could be improved.
See 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.
See 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?
Yes
If no, please let us know why and how they could be improved.
See 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?
See 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.
See attached submission.
Would you like to comment on any other aspects of the plan?
See attached submission.

If you would like to upload a submission, please do so here.

I am making this submission:
on behalf of a local council

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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The City of Port Phillip’s (CoPP) Council officers welcome the opportunity to comment on the Draft Infrastructure and Commercial Land Use Plan (the Plan) and work in collaboration with the State Government to plan for current and future commercial and industrial land requirements within the municipality and metropolitan area. Officers would like to highlight that a meeting of the Inner Metro Economy and Planning Working Group was not held as part of the preparation of the Plan. Officers would be highly supportive of the opportunity to participate more actively in the development of the Plan, particularly as it relates to Port Phillip.

The following submission provides commentary on the questions provided by DELWP and provides specific feedback on references made to industrial and commercial land within CoPP. This submission provides officer level feedback on the Plan. Please note this feedback has not been formally endorsed by Council.

Overview of Commercial and Industrial Land within CoPP

CoPP has four Major Activity Centres (Bay Street - Port Melbourne, South Melbourne Central,Carlisle Street - Balaclava, Fitzroy / Acland Streets - St Kilda), six Neighbourhood Activity Centres (Centre Avenue- Garden City, Bridport / Victoria Streets - Albert Park, Armstrong Street - Middle Park, Glen Eira Road - Ripponlea, Tennyson Street- Elwood, Ormond / Glen Huntly Roads - Elwood) and five local activity centres (Brighton Road- Elwood, Inkerman Street / Grey Street/ Barkley Street - St Kilda, Mills Street - Albert Park, Inkerman Street - St Kilda East, Graham Street - Port Melbourne).

CoPP’s key employment areas include the St Kilda Road Corridor (within the Central City as defined by Plan Melbourne), South Melbourne, St Kilda, Port Melbourne and Fishermans Bend. In planning for future growth, CoPP will need to ensure it retains an adequate supply of employment land in key precincts for a growing employment sector, particularly office space for the ‘knowledge economy’ which is at risk of being ‘crowded out’ by residential uses.

CoPP’s industrial land was reduced significantly with the rezoning of Fishermans Bend to the Capital City Zone (CCZ) in 2012. The area is now in the process of transitioning from a primarily industrial area to a high-density mixed used area. Small pockets of industrial land remain in Balaclava (Williams Street Industrial Precinct – IN3Z), Port Melbourne (Corner Normandy Road and Ingles Street – IN1Z), and South Melbourne (York Street Triangle - IN1Z). It is important to note that the Industrial Policy currently included at Clause 21.04-4 ‘Industry’ in the CoPP Planning Scheme is significantly outdated and is being updated as part of the Planning Scheme Review and local implementation of VC148.

Note: As part of Port Phillip’s ongoing strategic planning work, a South Melbourne Structure Plan and St Kilda Structure Plan will be prepared, with work likely to commence in July 2020.

Part A: Overview of Industrial and Commercial Land Across Melbourne

In principle, Council officers support the development of the Plan as a high-level planning framework to support both state and local governments to plan for future employment and industry needs and the implementation of
Plan Melbourne. However, as set out below, further clarification is requested regarding a number of areas of the Plan.

1) Do you think the principles and strategies provide enough clarity and guidance to assist planning for industrial and commercial land?

Yes. Council officers require further clarification about roles and responsibilities in implementing the principles in the Plan – what is the State’s responsibility and what will be Council’s responsibility?

2) Do you support the criteria developed to identify regionally-significant industrial precincts?

No, further information is needed. Further clarification is required understand how the criteria for identifying regionally-significant industrial precincts is intended to be applied. For example: how many of the criteria would need to be met to be able to identify a “regionally-significant industrial precinct”, when would this be applied, and what implications would it have? It would also be valuable to have insight into how the criteria was developed.

Further clarification is also required as to why it appears that Commercial 2 Zoned land has been classified as industrial rather than commercial land. The purpose in the C2Z zone is “To encourage commercial areas for offices, appropriate manufacturing and industries, bulky goods retailing, other retail uses, and associated business and commercial services.” (Council officer emphasis added in underline).

For example, Commercial 2 Zoned (C2Z) land in South Melbourne has been shown as a regionally-significant industrial land in Map 4: Inner Metro Region future direction map – industrial land, however this area is part of the South Melbourne Central Major Activity Centre, and therefore the land also meets the definition of regionally-significant commercial areas, which is Council officers preferred classification for the land, based on the existing land uses in the area and the Plan’s commentary on this precinct). Council officers request further discussions with DELWP officers regarding the classification of this area (please also see further comments on South Melbourne below).

3) Do you support the purpose developed for regionally-significant industrial precincts and local industrial precincts?

Yes – However, officers consider the purposes of the regionally significant industrial precincts and local industrial precincts could be further refined to provide more clarification as to the difference between the classifications. The purposes are quite general in nature and there appears to be some overlap between the two purposes (e.g. both refer to the local economy).

4) Do you have any comments or suggestions to improve the guidance for developing local industrial land use strategies?

Yes.

It is recommended that Appendix 2 should provide some guidance on when, and in what context a local industrial land use strategy should be developed. Appendix 2 should also provide include a clearer explanation of how planning controls could be applied in the implementation of a local industrial land use strategy. Understanding Appendix 2 as a potential planning practice note or other similar tool, it would benefit from clearer guidance with regard to the possible preparation of, and implementation of the local industrial land use strategies through the planning system.
The term ‘Precinct Plans’ also requires clarification – does this mean Structure Plans or a different type of strategic planning document? CoPP’s industrial areas are relatively small in nature, and often form part of a larger activity centre how would a ‘local industrial land use strategy’ or ‘precinct plans’ relate to, or be integrated into Structure Plans?

5) Have the key industrial and commercial areas been adequately identified and described across the regions?

No.

Fishermans Bend mixed use precincts (Montague, Sandridge and Wirraway) – CoPP

References within the Plan focus on the Fishermans Bend NEIC and no guidance is given for the mixed-use precincts within Fishermans Bend which are zoned Capital City Zone (CCZ). Three of these precincts (Montague, Sandridge and Wirraway) are within CoPP, and Lorimer Precinct is within the City of Melbourne. These four CCZ zoned precincts are envisaged to transition over time to a mixed-use area comprising of 80,000 residents and 80,000 jobs by 2050.

The CCZ zoned precincts within Fishermans Bend have not been identified as commercial areas on Map 3 Existing and future commercial land, 2018 or Map 5: Inner Metro Region future direction map – commercial land (both maps have this area blank). It is recommended that these CCZ zoned precincts within Fishermans Bend are included in these maps to provide further clarity that while these areas include some existing industrial areas, that they will continue to transition to a mixed-use area, making explicitly clear that these precincts are not ongoing industrial areas.

South Melbourne

a) ‘Emerging’ creative industries precinct

Council officers consider South Melbourne to be an established enterprise precinct with a strong creative industries cluster. The Plan states:

“The South Melbourne Central Business Precinct in the City of Port Phillip offers a mixture of service industries and showrooms, offices and warehouses. This precinct is emerging as a key location for creative industries such as design, music, film and television as well as photography. The area enjoys a premium location adjacent to the South Melbourne Major Activity Centre. It has close proximity to the CBD and Fishermans Bend as well as good access to a skilled workforce and public transport services” (p. 42).

While Officers support the acknowledgement of the role of South Melbourne as a significant creative industries cluster, it is recommended to reconsider reviewing the language to reflect that South Melbourne is an existing and long-standing enterprise precinct.

b) Upcoming South Melbourne Structure Plan

As previously mentioned, preparation of a new South Melbourne Structure Plan is likely to commence in mid-2020. The body of the Plan does not specifically envisage South Melbourne as having an industrial focus, or any significant growth in industrial uses of land over time. Traditional industrial uses that generate off site
impacts through noise or emissions are unlikely to be consistent with the future economic role and narrative of the area as a growing creative enterprise district within the broader metropolitan economy. This observation is consistent with the wording of the Plan, which recommends:

“Retain areas in and around Collingwood and Cremorne predominately for office, manufacturing and industrial uses and areas in South Melbourne Central Business Precinct predominantly for creative industry uses”

However, certain types of compact, advanced industrial uses (that can be configured vertically in multi storey buildings and have limited off-site amenity implications) may have a role within South Melbourne. Additionally, South Melbourne may provide design and other creative services to manufacturing clusters elsewhere (notably the Fishermans Bend Employment Precinct).

As also mentioned above, C2Z land in South Melbourne Central Activity Centre has been shown as a regionally-significant industrial land in Map 4: Inner Metro Region future direction map – industrial land, however being part of the South Melbourne Central Major Activity Centre, the land also meets the definition of regionally-significant commercial areas.

It is recommended that the apparent tension between the view outlined for the area in the report for predominantly creative industry uses and its inclusion in Map 4: Inner Metro Region future direction map – industrial land which shows the land zoned as Commercial 2 Zone within the South Melbourne Central Business Precinct as “Regionally Significant Industrial Land – Existing” be addressed.

Map 4: Inner Metro Region future direction map - Industrial land

Map 4: Inner Metro Region future direction map – industrial land identifies land zoned C2Z within the South Melbourne Central (identified as Business Precincts within the South Melbourne Central Structure Plan and Schedule 8 to the Design and Development Overlay) as “Regionally Significant Industrial Land – Existing”. As mentioned above, this is not considered to be consistent with the recognition of the area within the Plan as a significant creative industries cluster where traditional industrial uses are unlikely to be consistent with the future economic role and narrative of the area.

Local industrial land is correctly shown for the sites at Port Melbourne (Corner Normandy Road and Ingles Street – IN1Z), and South Melbourne (York Street Triangle- IN1Z). The Williams Street Industrial Precinct (IN3Z) is not shown on Map 4, the zoning may be reviewed as part of the upcoming St Kilda Structure Plan to be prepared by CoPP. No further land within the municipality is foreseen to be zoned solely for industrial uses.

Map 5 – Inner Metro Region future direction map – Commercial land

Further clarification is necessary to understand how the legend’s categories were applied to the map.

It is recommended that the categories used in the legend be reassessed to more appropriately represent the diversity of commercial and activity centres and sites. This could be achieved through differentiating between major activity centres, other activity centres (neighbourhood and local activity centres) and commercial land not in activity centres.

Attached to our submission is a map of the CoPP Activity Centres which sets out the activity centre hierarchy which aligns to the CoPP Planning Scheme. As Map 5 employs a different set of categories than those used locally in CoPP, there are discrepancies in how commercial land within CoPP is presented. For example, some
neighbourhood and local activity centres are shown as ‘Major Activity Centres- Existing’ while others are listed as ‘Other Commercial Land - Existing’. Furthermore, some of the land marked as ‘Other Commercial Land - Existing’ are neighbourhood and local activity centres and others are individual sites or pockets of commercial land outside an activity centre. Albert Road, South Melbourne is an example of commercial land outside an activity centre.

From a local perspective, it does not seem appropriate to have a local or neighbourhood activity centre listed as a ‘Major Activity Centre’. From a policy perspective, the application of ‘Major Activity Centre’ to local and neighbourhood activity centre is inconsistent with the network defined in Plan Melbourne, which only recognises Carlisle Street – Balaclava, Bay Street – Port Melbourne, South Melbourne and St Kilda within CoPP. This is also problematic considering that page 36 of the Plan suggests that “major activity centres identified in Plan Melbourne should be considered as places of regional [commercial] significance”. It is therefore highly important that the map differentiates between the ‘Major Activity Centres’ identified in Plan Melbourne and the other smaller neighbourhood and local activity centres.

The Plan’s methodology listed at Appendix 1 states that existing commercial land was considered on the basis of its inclusion in Commercial 1 Zone (C1Z), Activity Centre Zone (ACZ), Capital City Zone (CCZ) (and other zones not used in CoPP). However, significant proportions of Mixed Use Zone (MUZ) within CoPP are shown on the map. For example, Wellington Street and sections of land along St Kilda Road South are shown on the map as “Major Activity Centre - Existing”, when they are located within the MUZ and are located outside any of CoPPs defined activity centres. It is recommended that the boundaries for “Major Activity Centre- Existing” along St Kilda Road South and Wellington Street be reviewed and that this land be included in a different category.

Additionally, the boundaries of the Bay Street Activity Centre in Port Melbourne and the Carlisle Street Activity Centre in Balaclava on the map are not consistent with local boundaries. Please see CoPP Activity Centres Map attached to this submission.

Finally, as highlighted above, it is suggested that the CCZ area of Fishermans Bend within CoPP is shown on Map 4.