

Planning Implementation (DELWP)

From: contact@engage.vic.gov.au
Sent: Monday, 23 December 2019 10:28 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?

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:

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:

<https://engage.vic.gov.au/index.php/dashboard/reports/forms/viewDetail/2373>

Regards,

The Engage Victoria Team

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23 December 2019

DELWP

planning.implementation@delwp.vic.gov.au

To whom it may concern,

**Draft Melbourne Industrial and Commercial Land Use Plan
Wyndham City Council Submission**

Thank you for the opportunity to review the draft Melbourne Industrial and Commercial Land Use Plan.

This submission has been prepared in the context of Wyndham as one of the fastest growing municipalities in Australia. Our residential population is forecast to reach 512,591 by 2041.

As the residential population increases in Wyndham, the number of jobs has also been increasing. However, the increase in the number of residents is outstripping the increase in the number of jobs. Specifically,

- The number of residents increased from 166,699 to 227,008 from 2011 to 2016,
- The number of jobs increased from 43,401 to 61,909 from 2011 to 2016, and
- The difference between the increase in the number of residents compared to the number of jobs between 2011 and 2016 was 41,881, meaning a larger segment of Wyndham's workforce leave the municipality to go to work.¹

A key focus for Council has been ensuring that the rate of jobs growth aligns more closely with the residential growth rate. Providing jobs close to where people live is one of the fundamental elements of both the State and Local Planning Policy Framework. Achieving this aim has flow-on benefits of reducing traffic congestion and improving connections and quality of life.

Ensuring that there is sufficient land designated for the development of employment uses is critical in order for Council to attract business to locate in Wyndham and provide jobs for our residents.

Council officer's broadly support the recommendations of the land use plan. We particularly strongly support the protection of designated 'future' state and regionally significant industrial land for that purpose.

A response to the online survey questions is provided below.

¹ ABC The Business 12 June 2019

Planning Principles and Strategies for Employment Land (page 32)

Principle 2, Strategy 3

Activity centres in growth areas need to be considered in a different planning and economic context with regards to balancing commercial and residential development.

The West Growth Corridor Plan and Precinct Structure Plans identify a range of new activity centres across Wyndham – approximately 43 in total combined with our existing centres in established areas. It is yet to be demonstrated whether all these centres are economically viable in terms of their nominated role in the activity centre hierarchy.

Council is drafting an Activity Centres Framework which will recognise that centres will have different features, based on several factors including access to the PPTN, competition from existing centres, etc. It is likely that some centres may not be able to support all of the commercial floorspace designated in the relevant PSP without detracting from the viability of other centres that are better located to serve the Wyndham community. Given this, it is likely that some centres, for example those smaller centres (by retail and commercial floor space) located adjacent to an existing or future train station on the Regional Rail Link, to provide convenience retail needs, some commercial floorspace, but also a significant amount of higher-density residential.

Page 31 of the discussion paper outlines a number of items for 'consideration', including a need to review the commercial zones and in particular '*...the role and function of dwellings as a section 1 use in the Commercial 1 Zone and the role and purpose of the Commercial 2 Zone*'. This is based on commentary earlier in the report as to the risk that 'as of right' upper-floor residential use of developments prevents the future adaptive reuse for commercial purposes.

Whilst a review of the zones operation would be supported, we note that in the context of new activity centres in Wyndham's growth areas, our planning policy framework supports and encourages high density residential development above ground floor commercial premises. Given the locational attributes and number of these new activity centres, it may not ever be economically viable to have significant commercial uses at upper floors in some of these centres, particularly the smaller ones.

Allowing residential uses 'as of right' above ground level is one planning mechanism that Council can use to ensure vibrant, mixed-use centres that achieve our pillars of connection, concentration, capacity and choice. It is suggested that there may need to be further consideration of this matter. In larger centres where there is a desire to protect upper floors for commercial purposes this may be something that can be delivered by the application of appropriate zone schedules and maps/plans. However, in smaller centres where residential development above ground floor commercial premises is a more appropriate response this could be achieved via a different designation or application of a zone schedule. A one size fits all approach might not deliver the desired outcomes in all contexts or circumstances.

The current wording of the principle is not supported as it would limit Council's ability to plan for centres to provide appropriate levels of residential development, which would enable truly mixed-use activity centres.

Criteria to Identify Regionally-Significant Industrial Precincts (page 34)

Supported.

Purpose for Regionally-Significant Industrial Precincts and Local Industrial Precincts (page 35)

Supported.

Developing Local Industrial Land Use Strategies (appendix 2)

Supported.

Key Industrial and Commercial Areas – Regional Summaries and Directions

Supported.

Other Comments

Council's draft Wyndham Urban Framework Plan sets a long-term direction for the spatial planning and development of Wyndham, based on four pillars of Connection, Concentration, Capacity and Choice. Consistent with the primary Strategic document of Wyndham City Council, Wyndham 2040, its objective is to create Places for People, where employment, infrastructure and housing are delivered to maximise the opportunities for Wyndham's community.

Relevant to the discussion paper, a core principle of the framework plan is to concentrate commercial activity into defined major activity centres and employment precincts. Council is currently preparing both an Activity Centres Framework and an Industrial Land Use Strategy which will be based on this principle.

In achieving the aspiration of the framework plan in relation to commercial and industrial areas, **Council is facing several issues which should be discussed in the DELWP paper.** A brief summary is provided below.

Non-Industrial Land Uses in Industrial Zones

Activity centres in growth areas can often lack rent gradients and rent diversity stemming from a lack of street hierarchies/land value hierarchies in activity centres that do not support some services (e.g. not for profits, community-based organisations) and retail (e.g. independent retail, ethnic supermarkets). This is exacerbated by single ownership of activity centres and developers preferring higher value retail space in internalised shopping centres that attract chain and franchise businesses.

To achieve truly mixed-use centres, these types of uses should be accommodated and encouraged to locate in activity centres through the planning framework. Instead, they are often choosing to locate in industrial areas, which affects the quantum of land that is used/available for industrial purposes.

This is described as where commercial development occurs outside designated activity centres. There is growing concern that more out of centre development is occurring because of the relaxation of the commercial and industrial zones approved by the State Government in 2013 and the associated implementation issues in growth areas.

There are many commercial uses that are being established outside activity centres, either in residential or industrial areas. Such uses include childcare centres, medical centres, convenience restaurants and indoor recreation facilities. These uses are able to establish outside activity centres or not even close to activity centres because of the standard zone requirements in the Victoria Planning Provisions (VPPs). The Wyndham Planning Scheme contains a Non-Residential Uses in Residential Zones policy, but this is more directed to ensuring that potential adverse amenity impacts are minimised.

The Victorian Planning Provisions allow certain non-industrial uses in Industrial Zones, for example restricted retail premises (bulky goods). This has led a significant change in land use and development patterns in some precincts. For example, Old Geelong Road Hoppers Crossing, and Wallace Avenue Point Cook, which are both predominantly zoned Industrial 3 Zone, have increasingly been developed for bulky goods retail, office, entertainment, places of worship and gyms etc. Wallace Avenue is essentially now an activity centre in all but name.

As well as diminishing the land available for industrial uses, this change also has flow-on affects to the viability of designated activity centres and Council's aspiration for them to be areas where jobs and services are concentrated in vibrant and accessible destinations. They can also result in conflicts between perceived sensitive uses (childcare centres, places of worship, gyms etc) and industrial uses. The dispersal of these commercial uses into industrial zoned precincts is having significant impacts and Council suggests that the industrial zone provisions should be reviewed to ensure the objectives of industrial land use planning and sufficient land designations are met.

Development Patterns

In Wyndham, population growth is occurring outwards from key infrastructure of the Metro Rail Spine and Princes Freeway towards the RRL to the north, west and south-west.

While the RRL will improve accessibility overtime, it is significant to note that only two railway stations currently exist, and no time frame has been provided by the State Government on the delivery of future stations.

Further, the growth fronts are occurring at a relatively low residential density. This has the effect of limiting the potential of the new activity centres to support more employment, retailing and services.

A key implication of Wyndham's current growth pattern is that the least accessible parts of the municipality are found in the growth fronts, and these continue to grow rapidly while at the same time undermining the potential for the more accessible activity centres along the Metro Rail Corridor and Princes Freeway to provide employment, services and diverse housing, by further dispersing the catchments for these centres

The designation of industrial precincts in Wyndham has resulted in large areas of residential development particularly in Wyndham North and Wyndham West, that do not have convenience access to local service industry uses (i.e. car servicing). How local industrial precincts and activity centres can contribute to improving accessibility to these types of services should be considered.

Page 52 of the report provides a summary of the industrial precincts in the west. It lists Hoppers Crossing Industrial Precinct and the Werribee NEIC separately. Council's draft Wyndham Urban Framework Plan identifies the Werribee Spine along the metro corridor. The Spine would incorporate: Werribee Town Centre, the Werribee NEIC, Hoppers Crossing – Old Geelong Road, and Williams Landing. This agglomeration of employment and services based around an established infrastructure spine has the potential to become an employment precinct of metropolitan significance, and should be recognised in the discussion paper.

If you would like to discuss any of the above comments in more detail, please contact [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]

INTERIM DIRECTOR CITY ECONOMY, INNOVATION & LIVEABILITY