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 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
23 December 2019

Planning Implementation
Department of Environment, Land, Water and Planning

Knox City Council submission - Draft Industrial and Commercial Land Use Plan

Knox is pleased to make a submission to DELWP’s draft Industrial and Commercial Land Use Plan (draft Plan). This submission represents comments from officers on a without prejudice basis.

Prior to sharing our considerations on the policy we’d like to commend the Department for the detail and analysis presented in this draft Plan and thank you for the opportunity to comment.

Knox’s City Futures team – which brings together expertise and service delivery for Council around strategic planning, economic development, investment and partnerships, research and mapping – considers the draft Plan to be an important contribution to Knox’s own policy on future industrial and commercial land.

Knox’s Land for Business Directions Plan (https://www.knox.vic.gov.au/landforbusiness) considers land requirements using employment projections, current land supply, economic trends, drivers of change and planning policy. Land for Business aims to ensure there is adequate industrial and commercial land available moving forward, to protect this land from encroachment, and to provide direction for the development of vacant and underutilised sites where appropriate. The principles and considerations of the draft Plan are aligned with this policy, and strengthen the directions outlined in Land for Business.

Land for Business was adopted by Council on 17 December 2018, and was incorporated into the Knox Planning Scheme via Amendment C164.

Sharing of data to that captures land use and employment over time
DELPW’s work will enhance Knox’s Land for Business work with further data on land supply across the Eastern Region. We note that the report gives insight into land supply and cites unpublished data sources. Knox would welcome the publishing of this data to inform further strategic analysis and research, as it is currently working on monitoring changing trends through initiatives like it’s Land for Business Monitoring Framework, State of Knox report, Population and Liveability Profiles. Capturing and sharing more detailed data and land use and employment trends would further support Knox’s evaluation capabilities and enable greater certainty and alignment with State directions in future planning and policy making.

Redevelopment potential of brownfield sites
Knox’s Land for Business cites the importance of key propulsive economic sectors - such as manufacturing and health - in both providing local employment opportunities and being essential to building regional supply chains. This aligns with key tenets of Plan Melbourne that highlight the importance of retaining larger industrial precincts, promoting the renewal of older industrial precincts that are no longer suited to industrial activities and identifying areas no longer required for employment activities.
Through Land for Business, Knox has identified employment sectors that drive high value growth in the municipal economy, known as ‘Significant Business Locations’. These are Knox’s largest and most significant employment clusters, namely: Scoresby-Rowville-Knoxfield, Bayswater Business Precinct/Bayswater Activity Centre, Wantirna Health Precinct, Knox Central and Burwood Highway East Corridor.

Knox has also highlighted the opportunity for older industrial and commercial land within Significant Business Locations to be redeveloped to accommodate a shift in industrial trends, most notably the increase in knowledge based work. The intensification of older or underutilised sites in these areas is integral to the growth of these locations. There is little focus in the draft plan on older or underutilised sites (brownfield sites) and their redevelopment potential. The draft Plan on page 76 discusses the supply of industrial and commercial land across the eastern region and states that “there is no future land identified for industrial purposes.” Knox would welcome additional direction in this regard as these sites continue to transition to accommodate advanced manufacturing and knowledge based rather than traditional industrial and commercial uses.

Transport and parking issues are impacting Knox’s high value employment land
This increased demand of accommodation for knowledge based work is underpinning increased heights in employment land within Knox, however this type of development has not coincided with a focus on improving public transport access to this area.

The construction of carparks also adds considerable cost to a development. This is exemplified in the local business park (Caribbean Park) where there have been investments made for multi-level car parks, although the majority of industrial development in Knox still uses off-street parking. In development sites, this is negatively impacting access for commercial and industrial vehicles.

Further analysis of the need for public transport into older and existing industrial areas, and consideration of issues of parking and access (in particular access for in-fill development), will strengthen further iterations of this Plan.

The Bayswater Business Precinct and the Wantirna Health Precinct: Regionally significant employment precincts to highlight
The draft Plan outlines a framework to identify industrial and commercial precincts. Whilst supportive of this framework, Knox’s City Futures team strongly upholds the view that our municipality has two regionally significant employment areas: the Bayswater Business Precinct and the Wantirna Health Precinct (WHP). Defining them as employment precincts (or similar) better reflects the current and potential employment impact of these two areas, and the scope they offer to drive industrial and commercial renewal benefits to the Melbourne East region.

Further, on Page 36 Part A of the draft Plan discusses the classification of commercial land. It state that “major activity centres identified in Plan Melbourne should be considered as places of regional significance.” The major activity centres in Knox include Bayswater, Boronia, Rowville-Stud Park and Wantirna South-Knox Central. However, the draft Plan lists only Wantirna South-Knox Central is listed as a regionally significant commercial area in this document. Further clarification from the draft is sought in this regard.

Wantirna Health Precinct
Part A of the draft Plan makes multiple references to the healthcare industry, and expects this industry to experience the largest growth in jobs moving forward. The draft Plan goes on to
state in Page 19 Part A that “locations such as … health and education precincts... play an important regional role in accommodating industry and business and supporting job growth”.

In addition to this, Plan Melbourne makes specific reference to the Knox Private Hospital area (which is within the WHP) as an identified health precinct.

The WHP currently has small pockets of commercially zoned land, and is currently the subject of a master plan development process led by the Victorian Planning Authority (VPA). The Liverpool Health Precinct in Sydney is somewhat similar in size and could be comparable to the WHP in the future. It indicates that the WHP could accommodate 30,000 health and knowledge-based industry workers, which is considered a regional employment generator. Recognising the role of the WHP as a significant employment precinct in Melbourne’s East supports the principles developed in Part A of the draft Plan which aims to provide for significant local employment opportunities, and where appropriate, regional employment generators.

**Bayswater Business Precinct**

The Bayswater Business Precinct (BBP) has been a thriving business, innovation and employment hub for many years. It generates $14.1bn in output revenue (representing 12.5% of Melbourne East’s total revenue), supports 4,900 businesses and employs over 30,000 local people (Source: Remplan). The BBP is the second largest employment precinct in the eastern region (after the Monash National Employment and Innovation Cluster) and is critical to the economies of Knox, Maroondah, and Yarra Ranges.

With 90% of businesses employing 20 people or less, the average revenue generated per business is $2.88m compared with businesses in the Eastern Region which generate $1.11m. The average output generated per employee is $470K compared with Melbourne East’s $310K. The economic profile and regional capabilities index of the Precinct would suggest that with the appropriate level of investment, the BBP has the capacity to support the creation of an additional 20,000 jobs over the next 30 years.

Solely based on the economic performance of the BBP, Knox recommends the area to be categorised as a regionally-significant industrial precinct. Further strengthening this recommendation, the BBP presents opportunity to redefine the collaborative journey to transform a significant industrial precinct in Victoria.

Where renewal projects such as Fisherman’s Bend or Arden are being driven from a top down approach that has stemmed from a State Government commitment to these renewal projects, the BBP is a partnership of three councils (Knox, Maroondah and the Yarra Ranges). Working together through a shared budgetary and governance structure since 2016, the three councils have made significant progress in identifying the interests and organisations with the agency to realise the Precinct Transformation. Supporting this work has been the success of the BBP team adopting the City Partnerships framework of the UN Global Compact for future directions. With capacity frameworks in place, the BBP will be able to build the strategic partnerships and governance structures to facilitate and activate the investment required to bridge the gaps that the BBP has around public transport, better road access and energy infrastructure.

Recognising the role of the BBP as a regionally-significant employment or industrial precinct in Melbourne’s East supports the principles developed in Part A of the draft Plan which aims to provide for significant local employment opportunities, and where appropriate, regional employment generators.
If you wish to discuss any of the matters raised, please contact [Redacted] Strategic Planner,

Yours sincerely

[Redacted]

Acting Manager City Futures