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.

Please 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?

If no, please let us know why and how they could be improved.

Please 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?

If no, please let us know why and how they could be improved.

Please 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?
Please 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?

If no, please let us know which other area we should identify or how the areas can be better described.
Please see attached submission

Would you like to comment on any other aspects of the plan?
Please 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.
Draft Melbourne Industrial and Commercial Land Use Plan

Submission by Boroondara City Council

Adopted by the Urban Planning Special Committee on 16 September 2019
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1. INTRODUCTION

Council welcomes the opportunity to provide comments to the Department of Environment, Land, Water and Planning (DELWP) on the draft *Melbourne Industrial and Commercial Land Use Plan* (MICLUP).

Council is encouraged the draft MICLUP is more of a ‘snapshot' of the current state than a transformative vision of strategic land use planning for industrial and commercial land. There is significant value in understanding the current state of industrial and commercial land in metropolitan Melbourne and in the regional contexts, before narrowing the scope to consider more specific locations in detail.

The high level guidance provided in the form of guidelines and principles are considered generally sound, and Council anticipates the MICLUP will be considered as part of the ongoing work in preparing the Regional Land Use Framework Plans (LUFPs).

This submission will provide some general commentary on the MICLUP, before responding to the specific questions posed by DELWP on the Engage Victoria project webpage.

2. GENERAL COMMENTS

Before providing detailed answers to the specific questions raised by DELWP, Council first provides some general comments on key aspects of the plan.

2.1 Role of local government

Council acknowledges the detailed analysis and research undertaken to compile the data contained in the plan, and welcomes the role of DELWP in providing this information to assist local government in their strategic work at the local and regional levels.

The City of Boroondara is identified in the Inner South East Region (ISE), with the municipalities of Bayside, Glen Eira and Stonnington. The plan provides a ‘snapshot’ of the current conditions in the region, with statistics regarding population, employment and the economy. These are presented as facts, without any critical analysis.

One such statement is “by 2031 it is estimated that around another 79,000 additional jobs will be needed across the region. Almost two-thirds of the new jobs in the region are expected to be needed in the municipalities of Boroondara and Stonnington”.

This is provided without any additional guidance as to how these jobs can or should be accommodated, how Boroondara and Stonnington can work together to address
this strategically, or what DELWP’s or other Victorian Government Departments’ role might be in delivering an outcome. Council understands the MICLUP is intended to be a high level snapshot and vision document, but has questions regarding the implementation and actions that may arise for councils in the future.

The MICLUP does not contain any detailed analysis in relation to this data, but does attempt to provide a framework to prioritise future work.

For example, the MICLUP states “as there are no future commercial areas identified in the region (the ISE), councils will need to look at ways to accommodate project [sic] demand for commercial floorspace within existing commercial areas, as well as considering areas that could accommodate future floorspace requirements through rezonings” (p. 102). There is no further discussion on when or how this might occur.

The *Boroondara Community Plan 2017-27* highlights the importance of retaining control of planning decisions at the local government level to the Boroondara community. Council is committed to ensuring its role in strategic land use planning is not jeopardised. In this way, the MICLUP is not prescriptive and does not provide a top-down response about how communities should achieve these targets. In any future iterations of the MICLUP, it is paramount the autonomy of local government is maintained and the voices of local communities are respected.

### 2.2 The Inner South Eastern Region

The plan identifies the key directions for the Inner South Eastern (ISE) Region as follows:

*Planning for the region should:*

- **Identify and retain Bayside Business Area as a regionally-significant industrial precinct and protect it from encroachment of sensitive uses or other uses that would fragment the land and could compromise development and efficient operation of businesses in these locations.**
- **Review local industrial areas and identify areas important for retention to support local communities.**
- **Identify activity centres where commercial development should be prioritised to accommodate future needs.**

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• Identify locations where there is opportunity to support increased commercial development, and particularly office-based development with an employment focus (p.104).

These key directions are high level, and not visionary but common sense. The third action has already been achieved and identified in Plan Melbourne.

The MICLUP does not undertake its own analysis or strategic work, but sets up the guiding principles for this to be undertaken in the future without any detail on when or how this might happen. This strategic work would most likely fall to Council given that there are no state significant industrial or commercial areas identified in the City of Boroondara. While Camberwell Junction and Hawthorn-Glenferrie are identified as regionally significant commercial areas, this is more a reflection of the status they already have rather than a new role they are expected to play in the future. Council already has structure plans for these centres (as well as the Kew Major Activity Centre) that have been implemented into the Boroondara Planning Scheme by various planning tools. This again raises questions of implementation and the role of the MICLUP going forward.

2.3 Relationship with other plans and strategies

Council notes the relationship of this plan with other strategic work being undertaken by DELWP is unclear, particularly in relation to the Regional Land Use Framework Plans (LUFPs) that are in development. The Plan Melbourne Five-Year Implementation Plan\(^2\) states:

\[\text{In consultation with the Metropolitan Partnerships, the metropolitan regional planning groups will prepare a land-use framework plan for each of the six metropolitan regions. The land-use framework plans will include strategies for population growth, jobs, housing, infrastructure, major transport improvements, open space and urban forests.}\]

\[\text{The plans will identify:}\]

\[\begin{itemize}
  \item land to be set aside primarily for business and employment-generating purposes
  \item precincts and activity centres where a mix of higher-density residential, commercial and other activities are encouraged
  \item urban renewal precincts and sites where medium- and higher-density housing and mixed-use development will be encouraged
\end{itemize}\]

\(^2\) DE LWP (2017) Plan Melbourne Five-Year Implementation Plan
• transit-oriented development opportunities that arise from major transport infrastructure projects such as the Metro Tunnel, level crossing removals and the Regional Rail Link

• an access framework that ensures that activity centres and urban renewal, employment and tourism precincts are supported by walking, cycling, public transport and night travel options

• additional regional-scale community, health, education, recreation, sporting and cultural facilities

• additional regional open space networks and enhancements and greening initiatives.

Council is actively involved in working with DELWP and regional partners in the development of the LUFP for the Inner South East Region which has experienced significant delays. Council would like to further understand the relationship between these documents, and any actions or implementation requirements that may arise.

2.4 Industrial Land

Industry is not a significant land use within the City of Boroondara or indeed the region. There is only 140.7ha of industrial land in the Inner South Eastern (ISE) region, with a small percentage of this in Boroondara.

The places marked on Map 14: Inner South East Region future direction map - industrial land correspond with land in the municipality which is currently zoned Commercial Zone 2 (C2Z). The purpose of the C2Z is to encourage commercial areas for offices, appropriate manufacturing and industries, bulky goods retailing, other retail uses, and associated business and commercial services, and to ensure that uses do not affect the safety and amenity of adjacent, more sensitive uses.3

The City of Boroondara does not have any other industrially zoned land.

The MICLUP does not prescribe any new direction in relation to this land, beyond providing high level guidance on how local government could plan for or manage these locally significant industrial areas. As previously raised, it is unclear what the expectations are for Council in relation to these guidelines.

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3 Clause 34.02 of the Victoria Planning Provisions
2.5 Commercial Land

The MICLUP is evidently a ‘snapshot’ of the status quo as it relates to commercial land in Boroondara, and does not engage critically with the statements and the data that it presents. For example, it notes “Boroondara has the largest number of centres (51)” (p. 102). The MICLUP has not attempted to analyse the role of these centres, and simply notes their existence without a critical lens.

Further, there are some inconsistencies in the report that make it difficult to interpret. For example, the terminology adopted by the MICLUP, and the hierarchy of state, regional and local significance is not reflected in the Inner South East Future Directions map on p.106. This does not identify any state or regionally significant precincts, instead it shows “Major Activity Centres” and “other commercial land” (using the existing terminology from Plan Melbourne). The name “Future Directions” is slightly misleading in this context, given it only identifies existing industrial or commercial land in the ISE region4 and does not actually provide any future guidance.

These maps would benefit from more detail, particularly labels for the centres, given they align with (named) local or neighbourhood centres according to Boroondara’s local planning policy5. The Major Activity Centres are labelled on Map 15.

DELWP’s data indicates an additional 290,000m² of commercial floor space will be required in Boroondara from 2016 - 2031, approximately one third of that for retail6. There is no analysis of vacancy rates in existing commercial areas, particularly in the Major Activity Centres like Camberwell, or broader societal trends away from bricks and mortar retail to online, or from commercial office spaces to home-based businesses.

4 It is acknowledged the Methodology Report contained at Appendix 1 of the plan indicates in other regions zoned land identified in Precinct Structure Plans and/or Growth Corridor Plans is identified as “future” commercial or industrial land.

5 Clause 21.02 of the Boroondara Planning Scheme

6 It is acknowledged that Appendix 1 - Methodology Report provides the following definitions:

“Commercial retail floorspace is defined as floorspace used by retail, accommodation, food and other industries”. Commercial office floorspace is defined as floorspace used by business service industries.”
While Appendix 1 of the draft MICLUP provides a brief methodology of how future demand has been calculated, officers have not seen the actual analysis and data. They have therefore not been able to interrogate the data to determine whether these projections are accurate.

There also does not seem to be an equivalent guideline prepared for local commercial land as there has been at Appendix 2 for industrial land.

Again, Council will be actively participating in future iterations of this MICLUP and regional LUFPs to ensure implementation and future directions and actions that arise from these plans are appropriate.

### 3. RESPONSE TO SPECIFIC QUESTIONS

#### 3.1 Planning principles and strategies for employment land

**Question**

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.

**Response**

The principles are generally sound. They are very high level, and broadly apply common sense strategic land use principles. They are necessarily broad to allow for the range of scenarios that can be expected in working at this level. Council anticipates more specific strategies and actions will be provided in the regional LUFPs.

#### 3.2 Criteria to identify regionally-significant industrial precincts

**Question**

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.

**Response**

N/A - The City of Boroondara does not have any identified state or regionally significant industrial precincts.
3.3 Purpose for regionally-significant industrial precincts and local industrial precincts.

Question

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.

Response

The City of Boroondara does not have any identified state- or regionally-significant industrial precincts. Council supports the position that local government is best placed to deal with areas of local-significance.

3.4 Developing local industrial land use strategies.

Question

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?

Response

Council reiterates that local government is best placed to deal with areas of local-significance and has a major role to play in the planning for regionally significant areas. The content of the guidance contained at Appendix 2 for developing local industrial land use strategies is not particularly problematic, however the role of these documents is unclear. It is not made clear in the MICLUP whether councils are expected to draft these strategies, and if so, when? What statutory role would these documents play? The guidance itself should be published as a Planning Practice Note or similar, to clarify its role in the planning process.

3.5 Key industrial and commercial areas

Question

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.

Response

The key industrial and commercial areas appear to have been identified in the Inner South East Region. The identification and description of these areas is not new information, and appears to simply reflect existing zoning.

However, it is surprising the Kew Junction Major Activity Centre is not identified as regionally significant similar to Camberwell Junction and Hawthorn-Glenferrie. The definition for regionally significant commercial areas provided in the report states that regionally significant areas are “commercial areas and places identified in Plan Melbourne as major activity centres”. The map and list on pages 52, 53 of Plan Melbourne clearly identify Kew Junction as a Major Activity Centre. The fact it hasn’t been identified as regionally significant in the MICLUP therefore seems to imply some analysis must have been undertaken to justify it not being identified that is not reflected in the report and the definition of regionally significant commercial areas. While Council is not necessarily concerned about whether Kew is or is not identified as regionally significant, this raises questions over the analysis and methodology used and whether the full extent of analysis prepared has been provided.

4. CONCLUSION

Council values the role that DELWP play in facilitating local government cooperation and in considering strategic land use at the state and regional levels.

Council looks forward to being actively involved as the MICLUP and regional LUFPs progress, and to informing any implementation actions that arise from these plans.