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.

Principles and strategies are supported however an action plan is required. (Refer detailed 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?
Yes

If no, please let us know why and how they could be improved.
LaTrobe NEIC is vital for future employment in the north of Melbourne

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.
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?

Funding should be provided to assist Councils in developing local industrial land use strategies as these are often not prioritised given other competing demands for planning resources.

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?

Yes

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?

Please refer to the 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
The opportunity to comment on the draft Melbourne Industrial and Commercial Land Use Plan is welcomed and appreciated.

The State Government’s work in providing a planning framework to ensure commercial and industrial land is available to support current and future industry and employment is an important initiative which is supported and considered of value.

The Latrobe National Employment and Innovation Cluster (NEIC) is an important area to Banyule and should be well recognised and supported by the plan. State Government initiatives to drive the potential of the LaTrobe NEIC including the finalisation of the LaTrobe NEIC Framework Plan should be clear actions emerging from the Melbourne Industrial and Commercial Land Use Plan. The key locations within the LaTrobe NEIC that are of vital importance to Banyule and the north of Melbourne are the Heidelberg Activity Centre (Health), LaTrobe University (Education and research) and Heidelberg West Business Park (HWBP) (manufacturing and specialist services).

There is an emerging and changing role for the Heidelberg West Business Park (HWBP). Whilst the HWBP continues to provide manufacturing and warehousing in a traditional industrial form there is an evolving role for the Business Park in supporting higher technology production and services which should be supported by a clear planning framework at the State level for the entire LaTrobe NEIC. Please note the change of name for this area (formerly West Heidelberg Industrial Estate). Please update the plan accordingly in regard to all references to this location.

The plan appropriately identifies the following key industrial and commercial locations in Banyule:

- The West Heidelberg Industrial Estate (noting name should be HWBP) and the La Trobe NEIC as regionally significant industrial and commercial land;
- Industrial land identified in Bundoora, Montmorency and Briar Hill;
- Greensborough, Ivanhoe & Heidelberg being identified as major activity centres along with other smaller centres also being identified.

**Principles**

Key principles that area supported in the plan include the need to:

- Plan for industrial and commercial land to ensure adequate long-term land supply is planned for and set aside to support future industry and growth (Principle 1);
- Retain key industrial and commercial areas for their economic and employment contribution to the area (Principle 2);
- Plan for industrial and commercial land to provide clarity and certainty about how and where industry and business can grow over time to support and guide long term investment (Principle 3).
Strategies

Key strategies that are supported in the plan include those that:

- Retain significant industrial precincts and protect them from encroachment of sensitive uses and residential development that would compromise businesses in these locations. (This is a particular issue for parts of the Heidelberg West Business Park and more particularly the Heidelberg Activity Centre);
- Ensure precinct structure plans consider future demand for commercial and employment land (again a particular issue for the Heidelberg Activity Centre);

Action Planning

Whilst the principles and strategies are supported an action plan is a critical missing component to achieving the plans objectives. Many of the principles are very high level and reliant on a sophisticated understanding of employment planning and delivery at the local Council level.

For example, it is noted that the strategies at Principle 4 (page 32) could benefit from greater clarity. This might include specific references to how industrial precincts may actually be able to be grown and diversified. An action plan is needed to demonstrate how these principles and strategies can be achieved.

Industrial Land Use Strategies for Councils

In planning for local industrial precincts the draft plan suggests Councils develop an industrial land use strategy. This is considered a very worthwhile undertaking but is not currently a high priority for Council given other competing planning priorities that have emerged over recent years. Nonetheless, it is something that is worth pursuing, in particular with reference to the HWBP. Funding has previously been sought through the Victorian Planning Authorities Streamlining for Growth Program 2018/19. The Funding sought was $120,000 and would have enabled the development of a structure plan for the HWBP. At the time, funding support was not provided from the Victorian Planning Authority despite indications that it would likely be funded. Opportunities for funding to support the prioritisation of such a plan are important.

Night time economy

Consideration should also be given to references in the zoning of industrial estates to allow for the night time economy, particularly for the HWBP. This would enable the centre to evolve to better integrate with the La Trobe NEIC, through increasing the amenity, enhancing the business mix and improving perceptions of community safety.
Health Sector growth

In the Melbourne’s North section health care and social assistance is specified as an industry that is likely to experience the strongest growth. It is further described in page 65 which talks about the La Trobe NEIC and the concentration of health and retail. This growth and continued support for the Health Sector, particularly at Heidelberg, is considered critical for employment in the north of Melbourne as well as providing access to vital health services for the wider region.

Floorspace growth in Banyule

The reported existing figure (380,850 sqm) is similar to the combined retail and commercial figures (444,000 sqm) from Banyule Council’s 2017 Economic Information Base. Banyule’s Economic Information Base provides growth projections to 2036 (126,000 sqm), whereas this report specifies requirements to 2031 (74,700 sqm). The two figures are not directly comparable, however there appears to be consistency with their projections.

Table 22: Commercial floorspace supply and requirement, Northern Region

<table>
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<tr>
<th>Council</th>
<th>Existing commercial floorspace in 2018 (m²)</th>
<th>Commercial floorspace required 2016 to 2031 (m²)</th>
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<tbody>
<tr>
<td>Banyule</td>
<td>380,850</td>
<td>74,700</td>
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<tr>
<td>Darebin</td>
<td>812,550</td>
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<td>Hume</td>
<td>519,950</td>
<td>531,200</td>
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<td>Moreland</td>
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<td>Nillumbik</td>
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<td>Whittlesea</td>
<td>678,850</td>
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<td>Mitchell (within UGB)</td>
<td>22,850</td>
<td>111,100</td>
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<tr>
<td><strong>Total</strong></td>
<td><strong>3,239,150</strong></td>
<td><strong>1,691,100</strong></td>
</tr>
</tbody>
</table>

Relocation of Bulleen Industrial Estate as part of NE Link

It is considered that the relocation of the Bulleen Industrial Estate as a result of the North East Link is contrary to the objective of this plan and Principle 2 in particular. The Bulleen Industrial Estate should be recognised and retained for its economic and employment contribution to the local and regional community.

Northern Horizons: 50 Year Infrastructure Strategy for Melbourne’s North

It is noted that the Northern Horizons: 50 Year Infrastructure Strategy for Melbourne’s North (2016) has been reviewed to inform the development of this report. Please be aware that NORTH Link have commissioned an updated version of the document that is currently in draft format. The updated report outlines some significant changes that have occurred for the region since the development of the 2016 report including but not limited to –

- The population growth rate increasing higher than the forecast;
- Enhanced alignment with Plan Melbourne 2017 – 2050, with the core of local activity generation through strong cluster development and better connectivity;
- Stronger emphasis on the La Trobe NEIC and connectivity, particularly circumferential Public Transport connectivity;
- Capital investment spending deficit for Melbourne’s North and the GRP benefit of closing this gap.

NORTH Link also has a range of other reports that may provide useful insights including (but not limited to) the Melbourne’s North Regional Investment Attraction Strategy and Food and Beverage Growth Plan. Reports can be accessed at https://northlink.org.au/research/. It is highly recommended that NORTH Link is provided with an opportunity to comment on the Draft Melbourne Industrial and Commercial Land Use Plan if this hasn’t already been provided.

Timing of Consultation

The inconvenient timing of the consultation which includes the Christmas holiday period has made it difficult to comprehensively consider the draft plan across a range of disciplines. An opportunity to make further comments should the need arise would be appreciated.

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### Municipal Economic Projections 2016-2036

<table>
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<th></th>
<th>2016</th>
<th>2036 Projected</th>
<th>Growth</th>
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<tbody>
<tr>
<td>Employment</td>
<td>47,000</td>
<td>57,000 – 51,000</td>
<td>+10,000 - 14,000</td>
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<tr>
<td>Retail (sqm)</td>
<td>252,000</td>
<td>309,000</td>
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<tr>
<td>Commercial (sqm)</td>
<td>192,000</td>
<td>251,000</td>
<td>+69,000</td>
</tr>
<tr>
<td>Health (sqm)</td>
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