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 land owner

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

Privacy Policy Log In to Site
18 December 2019

DELWP
Via Email: planning.implementation@delwp.vic.gov.au

Dear Sir/Madam,

Re: Planning for Melbourne’s Industrial and Commercial Land
Submission by Keysborough South Landowners Group

KLM Spatial and Perry Town Planning act on behalf of land owners in Keysborough South, referred to as the ‘Keysborough South Landowners Group’, in relation to this submission to Planning for Melbourne’s Industrial and Commercial Land.

We understand that the purpose of the draft Melbourne’s Industrial and Commercial Land Use Plan is to assist State Government identify which land should be retained or considered primarily for industrial or employment purposes, and which could be considered for alternative uses. Further, to establish a hierarchy of precincts/centres based on the role and significance of the precincts/centres.

It is considered that the remit of this Plan should be broadened to identify those areas where expansion / growth of existing industrial or employment precincts should be facilitated, recognising the significance of these areas as well as the need to foster growth to ensure the ongoing viability of these precincts. Further, to optimise the use of existing infrastructure and transport connections.

Specifically, we refer to the Southern State Significant Industrial Precinct (Southern SSIP) and Dandenong South which is also a National Employment Innovation Cluster (NEIC) and an identified Metropolitan Activity Centre in Plan Melbourne. The locational advantages of the Southern SSIP are extensive and its ongoing viability and growth should be supported and facilitated by this Land Use Plan. Given the industrial land supply in this SSIP is anticipated to be exhausted by the early 2020s, release of additional land around this precinct should be investigated. The goal of this is to;

- Optimise the use of existing infrastructure / transport connections
- Encourage ongoing investment in this corridor
- Support the growth and viability of the established advanced manufacturing, freight and logistics which are the anchor to the SSIP
- Ensure the south-east can maintain its competitive advantage and minimise demand transfer to the north and west corridors

The Keysborough South Landowners Group strongly supports the intent behind this study and the need for a robust land use plan to guide industrial and employment land development. Further, to integrate industrial and employment land with key transport and infrastructure planning. However, the Group urges Government to review the existing Southern SSIP and how it will continue to grow and maintain its competitive advantage.

Keysborough South Landowners Group

The Keysborough South Landowners Group is focussed on the land bounded by Hutton Road to the north, Springvale Road to the west, Pillars Road to the south and Perry Road to the east (see below figure). It is described in the Council’s Green Wedge Management Plan as the Keys Road Precinct.
The subject land covers an area of approximately 582 hectares. Of this 582 hectares, 467 hectares is zoned Green Wedge A Zone whilst the balance 111 hectares is within the Urban Floodway Zone (see below zoning map).

History of the subject land and the Dandenong South Industrial Precinct

The Green Wedge Zone was applied to the land at the time of the introduction of the Victorian Planning Provisions. However, the land was never in a rural zone. It was within a Special Use Zone under the Springvale Planning Scheme prior to the introduction of the Victorian Planning Provisions. The result is that there are many smaller blocks within the precinct than the Green Wedge A zoning provisions currently allow. Under the Special Use Zone, it was possible to subdivide some of the land into allotments with a minimum size of 2 hectares.
The land is currently within the Green Wedge A Zone with a minimum lot size of 6 hectares but there are currently 64 individual allotments which are less than 6 hectares, with the smallest allotment just 1.4 hectares. It is also important to note that the land abuts the Industrial 1 Zone to its east and is partially within the Industrial 2 buffer which is a state-recognised buffer to be kept free of sensitive incursions (this is despite the current zoning of the land which does not recognise this buffer nor its significance).

Land to the north and west is within the General Residential Zone with the southern boundary of the precinct defined by the Mordialloc Creek. It is a contained area with urban zonings on three sides.

The land is serviced primarily by Perry Road and Hutton-Greens Road which also service the industrial areas abutting to the east. It comprises underutilised land which is appurtenant to the Dandenong South NEIC and is in an excellent location to enhance and complement the Cluster as it develops its nationally significant role.

The NEIC has a very important role as an employment focus but most of the zoned industrial land has already been occupied by existing land uses and it is projected that industrial land supply will be exhausted in the early 2020’s. Consideration should therefore be given to the potential release of land within the Keys Road Precinct to be included in the NEIC to enable of achievement of its full potential. Physical and transport connections in the immediate area link the land to the industrial and employment land uses to the east and it would be a simple transition to utilise land within the Precinct for industrial purposes and its incorporation the Dandenong South NEIC.

**Southern State Significant Industrial Precinct (SSIP)**

The subject land is adjacent to the existing Southern SSIP which is also part of the Dandenong National Employment and Innovation Cluster (NEIC).

Plan Melbourne recognises the Southern Region is expected to generate around 105,000 jobs by 2031. The SSIP will be a key employer and instigator of growth. It is ambiguous how this target will be met without growth in the Dandenong South region particularly given the demographic of the area.

A myriad of economic and land use studies initiated by City of Greater Dandenong over the last decade as well as the current background study provided by DELWP identify that the Southern SSIP will face significant supply constraints as early as 2020 with exhaustion of land supply shortly thereafter.

![Figure 3 – Existing Commercial and Industrial Zoning Map of Greater Dandenong, sourced from SGS Report, 2016](image-url)
**Relationship between Southern SSIP and Officer/Pakenham SSIP**

The response of the current study to this supply shortfall is the identified land supply in the Officer/Pakenham corridor. Whilst the land might be designated for industrial purposes, significant infrastructure including servicing and transport connections will be required to provide the necessary commercial attraction and more critically, viability to these areas. It is also unclear what the future uses/sectors will locate in Officer/Pakenham.

Given its physical location and existing key transport routes, the Southern SSIP will not compete with the Officer/Pakenham SSIP recognising:

- The anchors of the Southern SSIP are freight and logistics as well as advanced manufacturing.
- The Southern SSIP has access to key supply chains and distribution networks.
- The Freight Plan does not identify any intermodals proposed in the south-east. This in turn means it is more important to secure the cluster of uses at this location. Dandenong is the sole option in the south-east.

It is expected Officer/Pakenham will need to establish its own future industrial profile.

**Need for expansion of the Southern SSIP**

To ensure the southern region can maintain its competitive advantage over the west/north whilst allowing for its growth and expansion, the Study is somewhat short-sighted in identifying existing zoning and planning controls as a constraint to the potential expansion growth of this area. The existing planning controls are intended to service the overriding planning objectives and should be amended where appropriate to align with State and Local Government priorities particularly in regard to the SSIP and Dandenong South NEIC.

There is a change in the requirements for industrial land across the metropolitan area with a rise in advanced manufacturing and freight and logistics. Dandenong is well suited to continue to accommodate this form of land use given its proximity to key transport networks and nodes which is reinforced through its designation as a key employment node. These land uses are, however, land hungry and there is limited new industrial land available for release based on the current zoning pattern.

The Study should be open to support the ongoing viability and locational advantages of the Southern Precinct. These advantages and suitability of this location include:

**Utilising Existing Buffers**

- Industrial 2 Zone and amenity buffers – the rare Industrial 2 Zone applies to the core of the SSIP imposing on surrounding land parcels a 1,500 metre buffer (see Figure 4). The Local Planning Policy (Clause 21.04-3 Industrial) reinforces the need for these buffers to be maintained with no sensitive encroachments permitted.
- Dandenong is the only area in the South-East that has a designated Industrial 2 Zone reserved for heavy and/or offensive industries hence its significance more broadly.
- Whilst there have been historic incursions into the buffer, it is considered that the integrity of this buffer is critical to ensure the industry in this area can be protected. Recognising the limited number of uses which can be considered in the buffer due to amenity impacts, an appropriate land use outcome would be, as a minimum, for the land encumbered by the buffer to be zoned Industrial 1.
- The expansion of the Industrial 1 Zone into the existing buffer would provide greater certainty for Council/decision makers, land owners within the buffer and operators in the Industrial 2 Zone.
Immediate proximity to industrial land and services
- Complementary uses generally locate in the Industrial 1 zones with the Industrial 2 zone being set aside for those industrial activities which need it.
- As the supply of Industrial 2 Zone has been exhausted yet there is an increasing need for supporting industries or those industries which require large land parcels or areas yet are not “offensive enough”, additional land is required. This includes uses such as vehicle stores which are associated with the many materials recycling facilities located in the Industrial 2 Zone.

Proximity to roads and transport
- The Southern SSIP benefits from significant road networks and transport connections. Any expansion of the SSIP would also provide an opportunity to optimise the existing roads in the area which have key connections to main transport corridors including;
  - Eastlink
  - Springvale Road
  - Mordialloc Bypass (under construction)
Possesses an inherent competitive advantage through its strong transportation infrastructure, which comprises strong arterial road, freeway and fixed rail connections to the major transport and logistics gateways of the Port of Hastings, Moorabbin Airport.

Not suitable for agriculture

- Whilst the land is currently within the Green Wedge A Zone, the zoning of this land appears to have been a historical legacy rather than specifically intended.
- The agricultural use of the land is minimal within the precinct due to the small lot sizes and fragmented land ownership pattern.
- In addition, whilst there is evidence of this precinct historical having smaller equestrian related facilities, due to the proximity of the site to the existing industrial precinct, this provides a conflict for land uses recognising the sensitivity of horses to noise and dust and the impact of the industrial precinct to these.
- As such, the existing zoning of the land precludes a number of uses due to the industrial land which it is adjacent to without providing an appropriate buffer particularly given the imminent upgrade of Perry Road.

Limited vegetation and constraints

- The eastern section of the Precinct has minimal vegetation and constraints to its future development potential, notwithstanding the existing zoning.

Population Growth and 20 minute City

Whilst the study is focussed on employment and industrial land, it is also necessary to review and consider the impacts as a result of residential growth/development. This is pertinent given the Government’s underlying planning philosophy of “20-minute cities”, a sentiment which is further echoed in Plan Melbourne and the Planning Policy Framework.

According to the Victoria in the Future (2019), the residential population of Dandenong is expected to grow by an estimated 58,338 persons between 2016-2036.

In the context of the forecast population growth, and recognising the Plan Melbourne objective of 20-minute cities, the additional population will result in the need for new employment opportunities.

Other

It is prudent to note that although the Cranbourne West area is identified as a regionally significant industrial precinct, the underlying zone of this area is the Commercial 2 Zone. Accordingly, it should not be included in the industrial land supply as it is not zoned for this purpose. Whilst the Commercial 2 Zone does allow some warehouses and industry, subject to a planning permit, its underlying purpose and intent is different to that of the Industrial 1 Zone. As such, it is suggested that this be reviewed in the Study area as it is somewhat misleading when discussing overall land supply for industrial land.

Summary

- The need for the integrity of the Industrial 2 Zone buffer to be retained provides an opportunity for the land to the west of the existing SouthernSSIP to be rezoned to provide a complementary Industrial 1 Zone or similar zone which has the benefits of;
  - Providing additional industrial land supply to “round out” the precinct.
  - Better use of land within the buffer with a zoning which prohibits sensitive uses which are likely to result in conflict with the industrial land uses thereby providing greater certainty to land owners, the broader community and decision makers alike.
  - Additional land to optimise the use and functioning of key existing infrastructure and transport networks.
The expansion of the SSIP is considered to be an important and critical element given:
- Enhance the existing ready made market
- Need to maintain and indeed, enhance, the competitive advantage of this location particularly against similar industries establishing in the west and north
- Optimise existing infrastructure and connections
- Minimising the transferable demand of industry particularly to the west and north which has the potential to result in the precinct becoming a vacant area
- Extensive demand driven by manufacturing

The Keys Road Precinct provides an excellent opportunity for the enhancement of the potential of the SSIP and the Dandenong South NEIC. It comprises underutilised land immediately abutting an Industrial 1 Zone and features excellent access to main roads and the full range of urban infrastructure and facilities. It is submitted that the future planning for the Dandenong South NEIC should provide for expansion in recognition of the national importance of the Cluster. It should include an objective to provide for growth requiring the provision of additional land for introduction of innovative industries and related land uses.

We would welcome the opportunity to make further presentations to DELWP in relation to the Plan and request that we be included on any mailing list. Should you wish to discuss this submission further, please do not hesitate to call me on [redacted] or via email [redacted]

Yours Sincerely,