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:

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

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Dear Planning Implementation Team

Submission to DRAFT Melbourne’s Industrial and Commercial Land Use Plan
910 Donnybrook Road, Donnybrook

Tract has been engaged by 910 Donnybrook Road Pty Ltd (910 Donnybrook) to review and make submission on their behalf to the draft Melbourne Industrial and Commercial Land Use Plan (MICLUP).

910 Donnybrook is contracted to purchase the land identified as Lot B on Plan of Subdivision 829033N (910 Donnybrook Road, Donnybrook). The land is identified overleaf in Figure 1 and will be referred to as the ‘subject site’ throughout this submission. The subject site is within the City of Whittlesea and forms part of the recently exhibited Shenstone Park Precinct Structure Plan (PSP).

We take this opportunity to provide a submission on key matters of interest to 910 Donnybrook regarding the MICLUP and would be pleased to hold a meeting to further discuss the matters at your convenience.

1. Inconsistent with Shenstone Park PSP

Map B: Northern Region Future Direction Map - Industrial Land of the MICLUP identifies the subject site as ‘Regionally Significant Industrial Land – Future’. The glossary on Page 114 defines ‘Industrial Land’ as areas that allow for industrial use and development. This includes land within the Urban Growth Zone and identified as industrial in Precinct Structure Plans.

The Shenstone Park PSP identifies the subject site for a mix of business, light industry and industry. However, when viewed in its entirety, it is clear that the majority of the subject site does not form part of the core industrial area of the Shenstone Park PSP. Therefore, the subject site’s nomination as future Regionally Significant Industrial Land is incorrect. Refer to Attachment 1 – Plan 3 of Shenstone Park PSP.

Our client is also of the view that the land mix proposed under the PSP for the Donnybrook Road interface should be revised to provide a more logical land use and development pattern. This includes re-alignment of the waterway and street network and most of the land abutting Donnybrook Road (including the subject site) to be used for a range of commercial uses, including bulky goods, office, showrooms and mixed use. We note that our client’s suggested changes support the Economic Assessment commissioned by the Victorian Planning Authority (VPA) in regard to the Shenstone Park PSP, particularly the inclusion of 1.5 hectares of bulky goods and showroom use. Please refer to Attachment 2 – Land Use Concept Plan.

In summary, the subject site and adjoining properties fronting onto Donnybrook Road are not considered to be Regionally Significant Industrial Land when viewed against the Shenstone Park PSP.
2. Not required or appropriate for industrial purposes

Pages 61 to 72 of the MICLUP discusses the supply and demand for industrial and commercial land across the Northern Region. The plan highlights that "across the region there are 3,357 hectares of vacant zoned and unzoned industrial land available for development" and "Based on average consumption rates over the last three years there are approximately 27 years supply of (industrial) zoned land and around 35 years supply of unzoned land within the Northern SSIP." Page 67 of MICLUP.

It is evident that there is a large supply of industrial land relative to anticipated demand across the Northern Region.

In August 2019, our client engaged Urbis to conduct an Economic Assessment and to determine whether industrial use was an appropriate use of the subject site (as well as the broader adjoining Dennybrook Road southern interface). The assessment concluded that:

- The subject site’s proximity and size is not a preferred location for industrial uses relative to much larger sites with less constraints and competitive advantages.
- The exclusion of the subject site for industry would have no impact on extensive regional supply.
- There is no deficit of industrial jobs in the Northern Region that needs to be addressed by setting aside more industrial land.
- The region is recognised as having a large future supply of industrial land relative to demand.

Urbis’s Economic Assessment did also suggest that a local light industrial precinct in this location may be appropriate.

Based on the information provided within the MICLUP and our clients independent review, it is clear that the subject site should not be nominated as Regionally Significant Industrial Land.

3. Commercial Land

Pages 69 and 70 of the MICLUP discusses the supply and demand for commercial land. Page 69 states the following:

"Based on projected growth, by 2031 it is anticipated that approximately 1.7 million square metres of additional commercial floorspace will be required across the Northern Region. Approximately 739,500 square metres will be required for office uses and 951,600 square metres will be required for retail. Just under 60 per cent of additional floorspace will need to be provided in the growth area municipalities of Hume, Whittlesea and Mitchell (within UGB). All of these councils have land identified for future commercial purposes. If this floorspace is not able to be provided across new planned centres, then consideration will need to be given to ways to either provide additional opportunity for commercial development or increase the density of commercial development."

Page 70 concludes that "There will need to be a significant increase in the amount of commercial floorspace in growth area municipalities to serve growing populations in Whittlesea and Hume, and to a lesser extent, Mitchell."

There is clearly a need for more commercial land within the Northern Region and the subject site presents as a suitable location for commercial land.
4. Closure of Woody Hill Quarry

The MICLUP seems to have nominated the subject site and adjoining Donnybrook Road frontage as Regionally Significant Industrial Land due to the subject site's proximity to the Woody Hill Quarry and associated buffer areas. Under the new Work Authority WA006437, the Quarry will most likely cease to operate for quarry purposes within the next 20-30 years and/or the life of the Shenstone PSP and developed for less intensive industrial purposes. Subsequently, the buffers which currently apply would also cease to exist and allow the surrounding area, including the subject site to be developed for more sensitive uses. It should also be noted that under the Land Use Concept Plan (Attachment 2) proposed by our client, none of the blast buffers associated with the Quarry would apply to our client's land. The Economic Assessment commissioned by the VPA for the Shenstone Park PSP also suggests that the Quarry influences the allocation of employment land and this will significantly change upon the closure of the Quarry.

The buffer (as proposed via the Land Use Concept Plan) and anticipated closure of the Quarry further supports the case for not nominating the subject site as 'Regionally Significant Industrial Land'.

Conclusion

Our client's land at 910 Donnybrook Road, Donnybrook should not be nominated as Regionally Significant Industrial Land within the MICLUP. As discussed in this submission, there is a large supply of industrial land available in the Northern Region and given the competitive advantages held by other larger sites, the subject site is not suited for industrial purposes. Furthermore, the MICLUP highlights the significant demand for commercial land across the Northern Region. Whilst some light industrial uses could be considered across the subject site, in accordance with the information presented here, the site should be considered for commercial uses and not nominated as Regionally Significant Industrial Land.

Thank you for your consideration of our submission. Please do not hesitate to contact me to discuss any matter as required.

Your sincerely,

Enclosed:
Attachment 1 – Plan 3 of Shenstone Park PSP
Attachment 2 – Land Use Concept Plan.